

TSD File Inventory Index

Date: October 25, 2001

Initial: CMH/ver

Facility Name: <u>Consolidated Stores, Inc. (On Field Site)</u>			
Facility Identification Number: <u>OHD 095 030 979</u>			
A.1 General Correspondence	Y	B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	Y
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	Y
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	Y
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.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
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A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
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.6 CMS Progress Reports		.1 Human/Ecological Assessment	
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D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
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.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folder per schedule!*

**A.1 Public
Participation**

Westefor 886-7450
PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE U.S. Environmental Protection Agency Region V Waste Mgm. Div.		For Agency Use Only VOUCHER NUMBER
PLACE VOUCHER PREPARED 230 S. Dearborn St. Chicago, IL 60604	DATE PREPARED 8/14/84	SCHEDULE NUMBER
NAME OF PUBLICATION Columbus Dispatch		PAID BY
NAME OF PUBLISHER OR REPRESENTATIVE		
ADDRESS (Street, room number, city, State, and ZIP code) 34 S. Third Columbus, Ohio 43215		Contact: Connie Koebel (614) 461-5043

CHARGES

TYPEFACE	(size of type)	POINT PER	(inch, square, word, or folio)
NUMBER OR LINES (Indicate counted or space)		COST PER LINE	TOTAL COST
Line Rates	FIRST INSERTION	\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ►		
	TOTAL		\$
NUMBER OF UNITS (Indicate inch, square, word, folio)		COST PER UNIT	TOTAL COST
Other Rates	FIRST INSERTION	\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ►		
	TOTAL		\$
Attach one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.		TOTAL LINE RATES AND OTHER RATES	
		LESS DISCOUNT AT %	
		BALANCE DUE	\$
		VERIFIED (Initials)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION Estimate \$200 QTN 314 4A4E05\$002 6840200 2540	PAID BY CHECK NUMBER

1 If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here.

ADVERTISING ORDER

51840NALX
ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U.S. Environmental Protection Agency Region V Waste Mgmt. Div.

DATE
8/14/1984

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN

Columbus Dispatch

SUBJECT OF ADVERTISEMENT

Public Notice

NUMBER OF TIMES ADVERTISEMENT APPEARED

One Time Only

SPECIFICATIONS FOR ADVERTISEMENT

EDITION OF PAPER ADVERTISEMENT APPEARED

Friday August 24, 1984

DATE(S) ADVERTISEMENT APPEARED

August 24, 1984

Place as Legal Notice

Affidavit Required

COPY FOR ADVERTISEMENT

Please see attached Public Notice (2 pages)

AUTHORITY TO ADVERTISE		INSTRUMENT OF ASSIGNMENT	
NUMBER	51840NALX	NUMBER	
DATE	August 16, 1984	DATE	
SIGNATURE OF AUTHORIZING OFFICIAL	<i>Brigitte Manzoor</i>	TITLE	

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC,
D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 3:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ►
United States Environmental Protection Agency
Financial Operations Section-SMF-14
230 South Dearborn Street
Chicago, Illinois 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

PUBLIC NOTICE

The U.S. Environmental Protection Agency (U.S. EPA) has received a certification of change in status from the following two facilities:

Eton-Colby Chemical Company, 620 N. Cassady Ave., Columbus, Ohio
Columbus Products Company, 300 Phillipi Road, Columbus, Ohio

These facilities were storing waste considered hazardous under Federal law. This action will change the status of these facilities from storage facilities storing for more than 90 days to generators storing for fewer than 90 days (per 40 CFR 262.34). The status change for these facilities was effected by removing all hazardous waste stored for longer than 90 days, and by limiting the present accumulation period to fewer than 90 days.

The certifications of change in status were submitted to qualify for generator only status under the Resource Conservation and Recovery Act of 1976, as amended. U.S. EPA requires such certifications when facilities request a change in status from storage facilities to generators.

The certifications and related background materials are available to the public at U.S. EPA Waste Management Branch, 230 S. Dearborn, 13th Floor, Chicago, Illinois, (312) 886-7450, from 8:30 a.m. to 4:30 p.m. Monday through Friday. These materials may also be seen at the Ohio Environmental Protection Agency - Central District Office, 2244-46 S. Hamilton Rd., Columbus, Ohio, (614) 466-6450, during regular business hours.

Public comments concerning any of these two changes in status are requested by U.S. EPA and must be postmarked on or before September 24, 1984. Please send comments to:

United States Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Attention: Gary M. Westefer

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United States Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Attention: Gary M. Westefer

**A.2 Part A/
Interim Status**

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Columbus Products Company

EPA I.D. NUMBER: OHD 095030979

LOCATION CITY: Columbus

STATE: Ohio

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	<u> </u>	<u>X</u>
• Surface Impoundment	<u> </u>	<u>X</u>
• Land Farm	<u> </u>	<u>X</u>
• Waste Pile	<u> </u>	<u>X</u>
• Incinerator	<u> </u>	<u>X</u>
• Storage Tank (Above Ground)	<u> </u>	<u>X</u>
• Storage Tank (Underground)	<u> </u>	<u>X</u>
• Container Storage Area	<u> </u>	<u>X</u>
• Injection Wells	<u> </u>	<u>X</u>
• Wastewater Treatment Units	<u>X</u>	<u> </u>
• Transfer Stations	<u> </u>	<u>X</u>
• Waste Recycling Operations	<u> </u>	<u>X</u>
• Waste Treatment, Detoxification	<u> </u>	<u>X</u>
• Other <u> </u>	<u> </u>	<u> </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

Wastewater from a pickling operation. Unit design capacity is 75 GPM, consists of four processing tanks and clarifier each approximately 2000 gal. capacity. Removes nickel from process wastewater. Location is at southeast corner of factory building. Sludge is generated at a rate of approximately 1 cu. ft. per day and shall be transported off site to a TSD facility. This unit was placed in operation February 24, 1986. No sludge has been offered for transportation to date.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

None

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

W. F. Frey, President

Typed Name and Title

Signature

March 4, 1986

Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Longe
10/11
B. J. [unclear]

REPLY TO THE ATTENTION OF:

HRE-8J

October 23, 1992

Mr. Al Bell
Consolidated Stores, Inc.
300 Phillipi Road
Columbus, OH 43228-1310

Re: Visual Site Inspection
Consolidated Stores, Inc.
(formerly Columbus Products, Inc.)
Columbus, OH
ID No. OHD 095 030 979

Dear Mr. Bell:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for November 3, 1992, at 10:00 a.m. The inspection team will consist of Pete Zelinskas and Chris Cappel of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

Mr. Bell
October 23, 1992
Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Ed Lim, OEPA Central Office
Steve Rath, OEPA Central District Office

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-13

AUG 4 1983

H. A. Almy, Director
Factory Engineering and Services
Columbus Products Company
300 Phillipi Road
Columbus, Ohio 43228

RE: Permit Application Withdrawal Letter
FACILITY NAME: Columbus Products Company
U.S. EPA ID NO.: OHD 095 030 979

Dear Mr. Almy:

This is to acknowledge receipt of your letter of June 10, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly we will continue to process your application.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: G. F. Diekman, President
Richard Huntington, Senior Manufacturing Engineer



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAY 27 1982

Richard Huntington, Sr. Mfg. Engr.
Columbus Products Company
300 Phillipi Road
Columbus, Ohio 43228

RE: Interim Status Acknowledgement USEPA ID No. OHD095030979
FACILITY NAME: Columbus Products, Company

Dear Mr. Huntington:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: G.F. Diekmann, President
P.F. Salipante

Handwritten: 5/29/82

FACILITY NAME

COLUMBUS PRODUCTS COMPANY

EPA ID NUMBER

OH095030979

FACILITY OPERATOR

COLUMBUS PRODUCTS CO

FACILITY OWNER

WHITE CONSOLIDATED INDUSTRIES

FACILITY LOCATION

300 PHILLIPI RD
COLUMBUS

OH 43228

PROCESS CODE

DESIGN CAPACITY

UNIT OF MEASURE

S04	15660.00000
S01	8910.00000
T01	3250.00000
T03	0.02500

G
G
U
D

*****KEY**

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* UNIT OF MEASURE	CODE
STORAGE:				
			* GALLONS	G
			* LITERS	L
CONTAINER	S01	G OR L	* CUBIC YARDS	Y
TANK	S02	G OR L	* CUBIC METERS	C
WASTE PILE	S03	Y OR C	* GALLONS PER DAY	U
SURFACE IMPOUNDMENT	S04	G OR L	* LITERS PER DAY	V
DISPOSAL:				
			* TONS PER HOUR	D
			* METRIC TONS\HOUR	W
INJECTION WELL	D79	G, L, U, OR V	* GALLONS\HOUR	E
LANDFILL	D80	A OR F	* LITERS\HOUR	H
LAND APPLICATION	D81	B OR Q	* ACRE-Feet	A
OCEAN DISPOSAL	D82	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	* ACRES	B
TREATMENT:				
			* HECTARES	Q
			* POUNDS\HOUR	J
TANK	T01	U OR V	* KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	* TONS PER DAY	N
INCINERATOR	T03	D, W, E, OR H	* METRIC TONS\DAY	S
OTHER	T04	J, R, N, S, U, V	*	



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• OHD095030979

REACKNOWLEDGEMENT

COLUMBUS PRODUCTS COMPANY
300 PHILLIPI RD
COLUMBUS

OH 43228

INSTALLATION ADDRESS

300 PHILLIPI RD
COLUMBUS

OH 43228

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.
NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

OHD 095030979

Subsequent

PLEASE PLACE LABEL IN THIS SPACE

000442 AUG 18 80

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER APPROVED DATE RECEIVED (yr., mo., & day)

5 0HD095030979 21 A 800818

I. NAME OF INSTALLATION

COLUMBUS PRODUCTS COMPANY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 300 PHILLIPI ROAD

CITY OR TOWN

COLUMBUS

ST.

ZIP CODE

OH 43228

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 300 PHILLIPI ROAD

CITY OR TOWN

6 COLUMBUS

ST.

ZIP CODE

OH 43228

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 WHITE CONSOLIDATED INDUSTRIES

614-272-4468

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 HUNTINGTON RICHARD SR MFG. ENG

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

OHD095030979

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 15 1980

FOR OFFICIAL USE ONLY															
S	W	0	H	D	0	9	5	0	3	0	9	7	9	T/A	C
1	2											13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 1 7 23 - 26	2 F 0 1 8 23 - 26	3 F 0 0 1 23 - 26	4 F 0 0 2 23 - 26	5 F 0 0 6 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary. (DO NOT HAVE 40 CFR LIST)

13 K 0 6 2 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 2 2 3 23 - 26	32 U 2 3 9 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
-------------------	-------------------	-------------------	-------------------	-------------------	-------------------

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

Richard L. Huntington

NAME & OFFICIAL TITLE (type or print)

Richard L. Huntington
Sr. Manufacturing Engineer

DATE SIGNED



PLEASE PLACE LABEL IN THIS SPACE

000080 JUL 31 80

CONTINUE ON REVERSE

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

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SIGNATURE

Richard L. Huntington

NAME & OFFICIAL TITLE (type or print)

Richard L. Huntington
Senior Manufacturing Engineer

DATE SIGNED

7/29/80



Re: Hazardous Waste Activity Status
U.S. EPA I.D. No. OHD095030979
Ohio Permit No. 01-25-0505
April 1, 1985

G, TSD-3, 9

H.A. Almy
Factory Eng. & Serv. Director
Columbus Products Company
300 Phillipi Rd.
Columbus, Ohio 43228

Dear H.A. Almy,

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V
HWFB
D.O.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: September 27, 1984
SUBJECT: Changes in Status, State of Ohio

FROM: Gary M. Westefer
RAIU

Gmw

TO: Becky Strom
STU#2

The following are the closing dates for the Changes in Status for the State of Ohio. No comments have been received on the closures as of this date.

Eton-Colby Chemical Company, Columbus, September 24, 1984
Columbus Products Company, Columbus, September 24, 1984 ✓

Toledo- Edison Company:

Acme Generating Station, Toledo
Bay Shore Generating Station, Oregon
Delaware Operations Center, Toledo
Davis -Besse Nuclear Power Station, Oak Harbor

All four facilities close
September 24, 1984

Airmatic Allied, Inc., Wilmington, September 26, 1984
Inmont Corporation, Cincinnati, September 26, 1984
Carboline Company, Xenia, September 26, 1984
GMC-Fisher Body, Fairfield, September 26, 1984
GMC-Delco Products, Dayton, September 26, 1984
Fram Corporation, Greenville, September 26, 1984
Procter & Gamble Co., Cincinnati, September 26, 1984
Inmont Corporation, Greenville, September 26, 1984
Radium Petroleum co., Cincinnati September 26, 1984

SEP 27 1984

5HW-13

G. F. Diekmann, President
Columbus Products Company
300 Phillipi Road
Columbus, Ohio 43228

N
RE: Withdrawal of Part A
FACILITY NAME: Columbus Products Company
U.S. EPA ID #: OHD 095-030-979

Dear Mr. Diekmann:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you purpose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Tom Carlisle, Ohio EPA
Cheryl Kaiser, Ohio EPA
Richard E. Hill, Columbus Products Co.
P. F. Salipante, Columbus Products Co.
Richard L. Huntington, Columbus Products Co.

bcc: Lisa Pierard
Part A File
Rebecca Strom

5HW-13:RStrom:PGace:9-11-84

9-26-84 JS 9/27/84
WMB
Acting
WMB
9/27/84

INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
		PH 9/11/84	BLS 9/27/84		WJB 9/26/84		WMB 9/27/84		

Columbus Products Company

300 Phillipi Road
Columbus, Ohio 43228
614/272-4000

August 16, 1983

17

Karl J. Klepitsch, Jr., Chief
Waste Management Branch (5HW-13)
United States Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED
AUG 26 1983

WASTE MANAGEMENT
BRANCH

Subject: Permit Application Withdrawal Letter

Dear Mr. Klepitsch:

OHD 095 030 979, PA, GTS O, PAS NOV 9

Columbus Products Company (EPA ID No. OHD 095 030 979) requests that this be removed from your lists of hazardous waste treatment storage and disposal facilities for the following reasons:

1. In November of 1980 paint wastes were scheduled to become listed hazardous wastes in January 1981. In our production process paint waste overspray must be periodically removed from our conveyor hooks. This process of burning paint off of the hooks meets the definition of treatment, therefore, if the paint is hazardous the unit requires a hazardous waste incinerator permit. As you are aware, this listing of paint waste has since been indefinitely postponed. For this reason, and the reason that this waste does not possess the characteristics of hazardous waste, we do not have a hazardous waste incinerator as we had once feared.
2. Our filing of an interim permit application as a storage facility was done as a cost reduction matter in that, since we generate such low quantities of hazardous waste, removal within ninety days would mean that we would pay premium on transporting half empty trucks. However, we found when the Part B requirements were issued that the administrative burdens of such a storage facility exceeded the savings from moving only full trucks. Accordingly we have shipped all drums from our facility.
3. Columbus Products Company's closure plan for its hazardous waste storage facility is as follows:
 - A. Upon determination that the facility will no longer continue to store wastes beyond ninety days all waste barrels will be shipped to a licensed hazardous waste treatment storage and/or disposal facility. Since all spills and residues are cleaned up immediately, placed into drums and henceforth considered as hazardous waste, no special efforts are necessary for decontamination of equipment pursuant to 40CFR265.114.

RECEIVED
8/29/83

Subject: Permit Application Withdrawal Letter (cont'd.)

4. We certify that Columbus Products Company has closed its hazardous waste storage facility according to its closure plan. Enclosed are the manifests attesting to the shipment of all stored wastes via a licensed waste hauler to a licensed disposal facility.

If you need further information please contact H. A. Almy at 614-272-4335.

Sincerely,



G. F. Diekmann
President



Richard E. Hill, P.E.
Environmental Engineer

/pm

Enclosures

cc: Thomas E. Crepeau, Manager
Permits & Manifest Records Section
Division of Hazardous Materials Management
Ohio EPA

Columbus Products Company

300 Phillipi Road
Columbus, Ohio 43228
614/272-4000

June 10, 1983

U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

new
OHD 095 030 979 PA, G, TSD, PAS 1

Attention Mr. William Miner, Chief
Technical, Permits, and Compliance Section

Dear Sir:

In August 1982, Columbus Products Company notified the State of Ohio EPA that we will not store hazardous waste for more then 90 days and therefore requested cancellation of our TSD Permit Number 01-25-0505.

Region V was also to be notified, but evidently was not. I am attaching a copy of the letter sent to the State of Ohio and am requesting that you take similar action. This was discussed with Charles B. Slaustas of your staff, today.

If any further questions develop, please contact me at your convenience.

Sincerely,

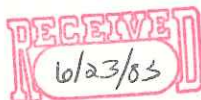


H. A. Almy, Director
Factory Engineering & Services

/pm

Attachment

cc: Mr. R. E. Hill



RECEIVED
JUN 21 1983

WASTE MANAGEMENT
BRANCH

Columbus Products Company

300 Phillipi Road
Columbus, Ohio 43228
614/272-4000

August 25, 1982

Mr. Thomas E. Crepeau
Permits & Manifest Records Section
State of Ohio EPA
361 E. Broad Street
Columbus, Ohio 43216

Dear Sir:

Effective immediately we will not store hazardous waste for more than 90 days, and therefore request cancellation of our TSD Permit Number 01-25-0505.

Due to a reduction in operation level only a small quantity of waste will be generated and this waste will be disposed of within 90 days.

Hazardous waste presently in storage will be disposed of within the 90 day storage period.

Sincerely,



H. A. Almy, Director
Factory Engineering & Services

/pm

cc: Mr. R. E. Hill

Ohio EPA

Re: Franklin County
OHD095030979
HWFAB 01-25-0505

DD
PSA

Mr. H. A. Almy, Director
Factory Engineering and Services
Columbus Products Company
300 Phillippi Road
Columbus, Ohio 43228

December 14, 1982

Dear Mr. Almy:

Thank you for your written response to my letter of November 9, 1982, regarding the RCRA Interim Status Inspection conducted at the Columbus Products Company. The additional information you provided concerning Placards (Page 2-2, 5c) and Container Inspection (Page 5-1, 4) should satisfactory resolve the deficiencies cited for these items in the October 25, 1982, Inspection Report. However, your response concerning Personnel Training (Page 2-2, 8,9) and Contingency Plan (Page 3-2, 1d,3) did not satisfy Interim Status Hazardous Waste Regulations.

Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act require that generators of hazardous waste have a training program which instructs facility personnel in Hazardous Waste Management Procedures. Generators of hazardous waste must also have a Contingency Plan for their facility designed to minimize hazards to human health and the environment in the event of any unplanned sudden or non-sudden release of hazardous waste.

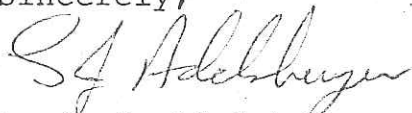
Before Columbus Products Company can be considered to be in compliance with Interim Status Hazardous Waste Regulations they must have developed and implemented a Personnel Training Program satisfying the requirements set forth in 40 CFR Part 265.16. The facility must also have an up to date and operational Contingency Plan satisfying the requirements of 40 CFR, Part 265, Subpart D.

Follow-up letter.
Still not in compliance.

Page - 2 - Franklin County
OHD095030979
HWFAB 01-25-0505

Columbus Products Company must comply with the preceding two requirements by January 31, 1983, in order to avoid this matters referral to the Ohio EPA Enforcement Unit. Please respond in writing and provide this office with a copy of your Personnel Training Program by the above date.

Sincerely,



Lundy J. Adelsberger
Environmental Engineer
Division of Hazardous Materials Management
Central District Office

LJA/sc

cc: Ms. Paula Cotter, Compliance Unit, DHMM, C.O.
cc: Mr. Ken Westlake, Region V, U.S. EPA

G.F. Diekmann, President
Columbus Products Company
300 Phillipi Road
Columbus, OHIO 43228

RE: Withdrawal of Part A
Facility Name: Columbus Products Company
U.S. EPA ID #: OH0095030979

Dear Mr. Diekmann:

OHIO ENVIRONMENTAL Protection Agency

This Agency has been advised by the (~~State Agency Name~~) that the referenced facility is no longer operating as a (~~treatment, storage, disposal~~) facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a (generator storing less than 90 days, ~~transporter, small generator, non-regulated facility, etc.~~). This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you purpose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the (State Agency) at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6114, for assistance.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure/Part A

cc: State Agency

Same
Add.
AS
Above

cc: Richard L. Huntington, Senior Manufacturing Engineer
cc: Richard E. Hill, P.E. Environmental Engineer
cc: P.F. Salipante

Tom Carlisle, OEPA
Cheyl Kaiser, OEPA

cc: Rebecca Strom
Lisa Pierard
Part A file

FORM 1 GENERAL				ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>		I. EPA I.D. NUMBER OH D 095030979																																																					
II. POLLUTANT CHARACTERISTICS		III. FACILITY NAME Columbus Products Company 300 Phillipi Road Columbus, Ohio 43228		IV. FACILITY MAILING ADDRESS 300 Phillipi Road		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.																																																					
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.		<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK 'X'</th> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK 'X'</th> </tr> <tr> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> </tr> </thead> <tbody> <tr> <td>A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)</td> <td></td> <td>X</td> <td></td> <td>B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)</td> <td>X</td> <td></td> <td></td> <td>D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)</td> <td>X</td> <td></td> <td>X</td> <td>F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)</td> <td></td> <td>X</td> <td></td> <td>H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td> <td></td> <td>X</td> <td></td> <td>J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td> <td></td> <td>X</td> <td></td> </tr> </tbody> </table>		SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'			YES	NO	FORM ATTACHED	YES	NO	FORM ATTACHED	A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. 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IV. FACILITY CONTACT HUNTINGTON RICHARD L SR MFG ENG		B. PHONE (area code & no.) 614 272 4000		V. FACILITY MAILING ADDRESS 300 PHILLIPI RD COLUMBUS OHIO 43228																																																							
VI. FACILITY LOCATION 300 PHILLIPI RD FRANKLIN COLUMBUS		D. STATE OH		E. ZIP CODE 43228																																																							

VIII. OPERATOR INFORMATION

F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND		
C	C O L U M B U S										O H		4 3 2 2 8		Is the facility located on Indian lands?	
B															<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 52	
15	16					40	41	42	43	44	45	46	47	48	49	50

X. EXISTING ENVIRONMENTAL PERMITS														
A. NPDES (Discharges to Surface Water)						D. PSD (Air Emissions from Proposed Sources)								
C	T	I				C	T	I						
9	N		0	H	0	0	0	0	4	5	9		6	30
15	16	17	18				30	15	16	17	18			
B. UIC (Underground Injection of Fluids)						E. OTHER (specify)						(specify)		
C	T	I				C	T	I						
9	U		N	A		30	9			N	A			30
15	16	17	18				30	15	16	17	18			
C. RCRA (Hazardous Wastes)						E. OTHER (specify)						(specify)		
C	T	I				C	T	I						
9	R		T	O	B	E	I	S	S	U	E		D	30
15	16	17	18				30	15	16	17	18			

XI. MAP


Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURER OF REFRIGERATORS AND DISHWASHERS

$$F_9: \frac{A}{51}$$

XIII. CERTIFICATION (see instructions)		
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.		
A. NAME & OFFICIAL TITLE (type or print) G. F. DIEKMANN, PRESIDENT	B. SIGNATURE 	C. DATE SIGNED 11/7/88

COMMENTS FOR OFFICIAL USE ONLY	
C	
C	
15	16

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)		I. EPA I.D. NUMBER 0 H D 0 9 5 0 3 0 9 7 9 3 1	
FOR OFFICIAL USE ONLY				COMMENTS	
APPLICATION APPROVED		DATE RECEIVED (yr., mo., & day)			
23		24		29	
II. FIRST OR REVISED APPLICATION					
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.					
A. FIRST APPLICATION (place an "X" below and provide the appropriate date)					
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)					
<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)					
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)					
C	YR.	MO.	DAY		
8	5	2	01		
13	73	74	75	76	77
B. REVISED APPLICATION (place an "X" below and complete Item I above)					
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS					
<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT					
III. PROCESSES - CODES AND DESIGN CAPACITIES					
A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).					
B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.					
1. AMOUNT - Enter the amount.					
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.					
PROCESS		PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	
Storage:				Treatment:	
CONTAINER (barrel, drum, etc.)		S01	GALLONS OR LITERS	TANK	
TANK		S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	
WASTE PILE		S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	
SURFACE IMPOUNDMENT		S04	GALLONS OR LITERS		
Disposal:				OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	
INJECTION WELL		D79	GALLONS OR LITERS	T01	
LANDFILL		D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	T02	
LAND APPLICATION		D81	ACRES OR HECTARES	T03	
OCEAN DISPOSAL		D82	GALLONS PER DAY OR LITERS PER DAY	T04	
SURFACE IMPOUNDMENT		D83	GALLONS OR LITERS		
UNIT OF MEASURE		UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	
GALLONS		G	LITERS PER DAY	ACRE-FEET	
LITERS		L	TONS PER HOUR	HECTARE-METER	
CUBIC YARDS		Y	METRIC TONS PER HOUR	ACRES	
CUBIC METERS		C	GALLONS PER HOUR	HECTARES	
GALLONS PER DAY		U	LITERS PER HOUR		
EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.					
C					
DUP					
3 1					
12 13 14 15					
B. PROCESS DESIGN CAPACITY					
1. AMOUNT (specify)					
2. UNIT OF MEASURE (enter code)					
FOR OFFICIAL USE ONLY					
B. PROCESS DESIGN CAPACITY					
1. AMOUNT					
2. UNIT OF MEASURE (enter code)					
FOR OFFICIAL USE ONLY					
X-1 S 0 2 600 G					
X-2 T 0 3 20 E					
1 S 0 1 8910000 G					
S 0 4 15660000 G					
3					
4					
16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32					

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04" - FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

PAINT SLUDGE IS AIR DRIED IN OUTSIDE PITS TO ALLOW IT TO HARDEN AND TO INCREASE SOLIDS CONTENT FOR LANDFILL DISPOSAL.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

[illegible]

623

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	0	9	5	0	8	0	9	7	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6: A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

39	57	30	0
65	66	67	68

LONGITUDE (degrees, minutes, & seconds)

083	03	06	30	0
72	73	74	75	76

VIII. FACILITY OWNER
☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E	WHITE CONSOLIDATED INDUSTRIES
15	16

2	1	6	2	5	2	3	7	0	0
55	56	57	58	59	60	61	62	63	64

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F	11770 BERA ROAD
15	16

G	CLEVELAND
43	44

O	H
40	41

4	4	1	1	1
47	48	49	50	51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

P. F. SALIPANTE

B. SIGNATURE

P. F. Salipante

C. DATE SIGNED

11/17/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

G. F. DIEKMANN

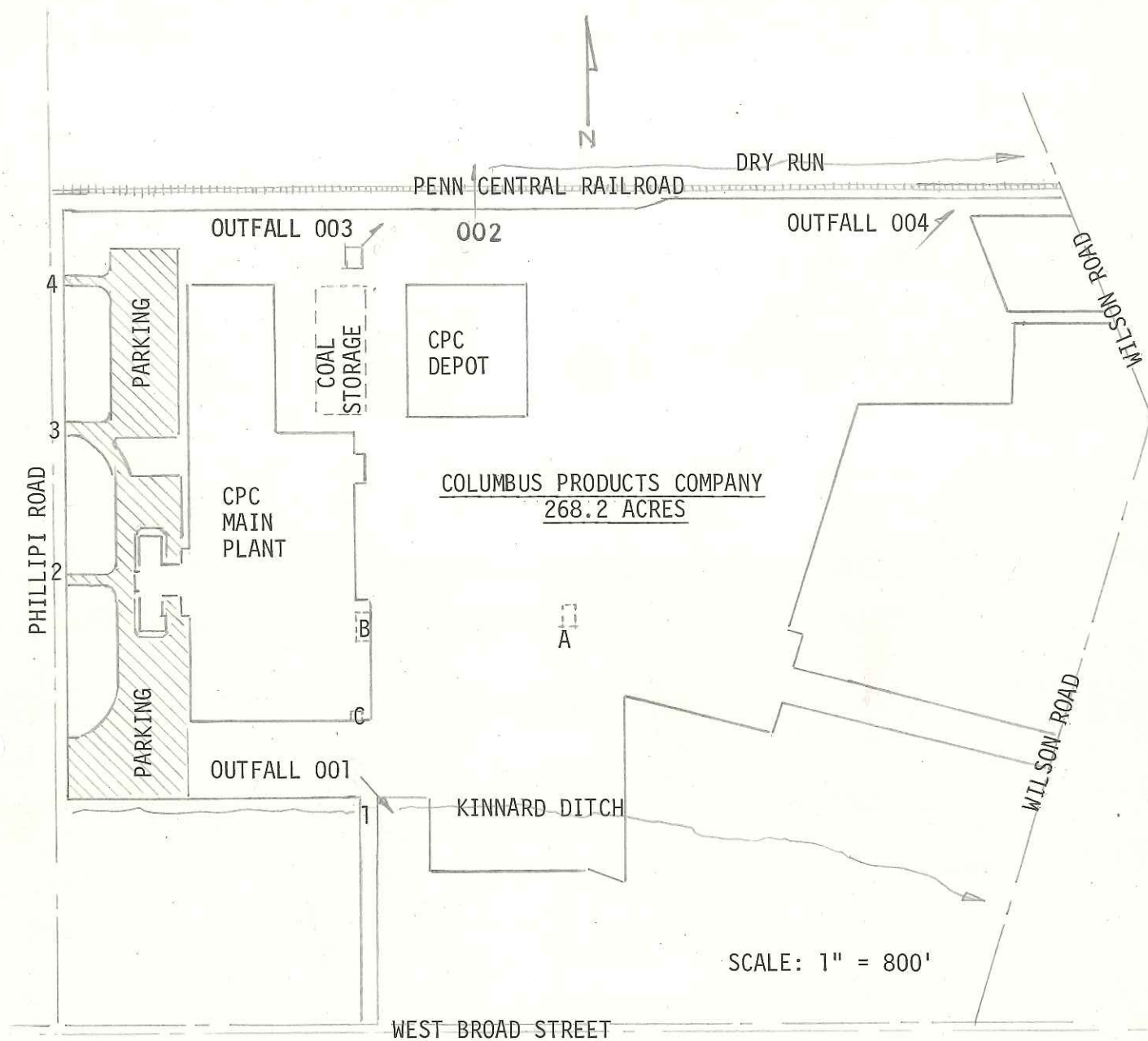
B. SIGNATURE

G. F. Diekmann

C. DATE SIGNED

11/17/80

V. FACILITY DRAWING (see page 4)



- A - PAINT SLUDGE DRYING PIT 24' X 24'
 B - SALVAGE AREA, DRUM HANDLING AND STORAGE 80' X 240'
 C - LIME NEUTRALIZATION AREA, ACID WASTE TO SANITARY SEWER 20' X 40'
 1, 2, 3 & 4 - GATE NUMBERS



C.2 Compliance and Enforcement

Certified
P-456-027-855

JUN 02 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

50M-13

Mr. Richard L. Huntington
Columbus Products Co.
300 Phillipi Road
Columbus, Ohio 43228

Re: Columbus Products Co.
EPA I.D. No. CHD 095030979
300 Phillipi Road
Columbus, Ohio 43228

Dear Mr. Huntington:

The above referenced facility is a hazardous waste treatment, storage, or disposal facility subject to the Resource Conservation and Recovery Act (RCRA) as amended. Federal regulations (40 CFR Part 265 Subpart H) require that such a facility shall provide to the United States Environmental Protection Agency (U.S. EPA) proof of financial assurance for closure by July 6, 1982, and liability coverage by July 15, 1982, (40 CFR 265.143 and 265.147 respectively).

To date U.S. EPA has not received these proofs; consequently, the facility is in violation of requirements of 40 CFR Part 265 Subpart H. The Agency considers these financial responsibility proofs as significant requirements of the hazardous waste regulations. Failure to provide these required proofs within 30 days of receipt of this notice may subject the facility to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation. Please forward the financial responsibility proofs to:

RCRA Activities
Attn: Financial Requirements
P.O. Box A3587
Chicago, Illinois 60690

If you have any questions or desire additional information, please contact Mr. Charles B. Slaustas of my staff, at (312) 353-2474.

Sincerely,

William Miner, Chief
Technical, Permits, and Compliance Section

cc: Deborah L. Tegtmeyer, OEPA

bcc: Thomas B. Golz, TPCS

CBS
6/2/83

WJH
6/2/83

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

81-008

TO:	FROM:
T/S/D FACILITY SOLVENT RESOURCE RECOVERY INC	Generator COLUMBUS PRODUCTS CO.
E.P.A. ID Code No. OHD093945293	E.P.A. ID Code No. OHD095030979
Address 4301 INFIRMARY ROAD	Address 300 WILKINSON PHILLIPS RD.
Destination WEST CARROLTON, OHIO 45449	Origin COLUMBUS, OHIO 43228
Phone (513) 859-6101	Phone (614) 272-4401

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat ID No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption No.)
1	SPENT METHYLENE CHLORIDE			F002	1200 LB	

PLACARDS REQUIRED

NOTE - Where the receiver is not on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the shipper shall sign the following statement:
The carrier shall not have delivery of this shipment without payment of freight and all other lawful charges.

FREIGHT CHARGES

PREPAID COLLECT



(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)

EMERGENCY RESPONSE INFORMATION

T/S/D FACILITY	CONTACT Name RICHARD L. HUNTINGTON
E.P.A. ID Code No.	Phone (614) 272-4468
Address	National Response Center 1-800-424-8802
Destination	in D. C. 426-2675

CERTIFICATION

This is to certify that the above named material is properly classified, described, packaged, marked, and labeled, and that it is in conformity with the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature *Bryant H. Riley* BRYANT H. RILEY, SUPERVISOR - SALVAGE Date JUNE 9, 1981

TRANSPORTER #1 MID-WEST LIQUID WASTE E.P.A. ID No. OHD072858533
Address 5114 TRENTON-FRANKLIN RD.
City MIDDLETOWN, OHIO State Zip Phone 866-0251

VEH. ID. NO. 14B827 (OHIO)
This is to certify acceptance of the hazardous waste shipment.
Transporter No. 1 Signature *Dan* Date 6/9/81

TRANSPORTER #2 E.P.A. ID No.
Address
City State Zip Phone

This is to certify acceptance of the hazardous waste shipment.
Transporter No. 2 Signature Date

TREATMENT/STORAGE/DISPOSAL FACILITY

This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.
T/S/D FACILITY Signature *Don* Date 6-10-81

81-008 ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING 11:24 to 11:10

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

83-002

TO: Systech Liquid Treatment T/S/D FACILITY c/o General Portland, Inc. E.P.A. ID Code No. OHD005048947 Address Box 266 Destination Paulding, Ohio Phone (419) 399-4835	FROM: Generator Columbus Products Co. E.P.A. ID Code No. OHD095030979 Address 300 XXXXXX Phillipi Rd. Origin Columbus, Ohio 43228 Phone (614) 272-4401
---	--

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat ID No.	EPA Haz Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
Bulk	Flammable Liquid N.O.S. (Waste Paint Solvent)	Flammable Liquid	UNT993	F003	12740	Flammable

PLACARDS REQUIRED <u>Flammable</u>	NOTE: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignor)	FREIGHT CHARGES PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
------------------------------------	---	--	--

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY) T/S/D FACILITY <u>None</u> E.P.A. ID Code No. _____ Address _____ Destination _____	EMERGENCY RESPONSE INFORMATION CONTACT Name <u>Bryant H. Riley</u> Phone <u>(614) 272-4401</u> National Response Center 1-800-424-8802 in D. C. 426-2675
--	--

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature <u>Bryant H. Riley</u> Bryant H. Riley, Suprv. Salvage Date <u>April 19, 1983</u>
TRANSPORTER #1 <u>Ace Liquid Waste Haulers</u> Address <u>3715 Beechmont Court</u> City <u>Cincinnati, Ohio</u> State _____ Zip _____ Phone <u>(513) 871-8397</u> E.P.A. ID No. <u>OHD017609900</u>
Transporter No. 1 <u>T. Dearden Eckert</u> Signature _____ Date <u>April 19, 1983</u>
TRANSPORTER #2 _____ Address _____ City _____ State _____ Zip _____ Phone _____ E.P.A. ID No. _____
Transporter No. 2 _____ Signature _____ Date _____
TREATMENT/STORAGE/DISPOSAL FACILITY T/S/D FACILITY _____ Signature _____ Date <u>4-20-83</u>

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

83 - 001

TO:	FROM:
T/S/D FACILITY Solvent Resource Recovery, Inc.	Generator Columbus Products Company
E.P.A. ID Code No. OHD093945293	E.P.A. ID Code No. OHD095030979
Address 4301 Infirmary Road	Address 300 Phillipi Road
Destination West Carrollton, Ohio 45449	Origin Columbus, Ohio 43228
Phone (513) 859-6101	Phone (614) 272-4401

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat ID No.	EPA Haz Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
Bulk	1,1,1 Trichloroethane (spent)	ORM-A	UN2831	F001	823 lb	NONE
Bulk	Methylene Chloride (spent)	ORM-A	UN1593	F002	8777 #	NONE

PLACARDS REQUIRED NO PLACARDS REQUIRED

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignee)	FREIGHT CHARGES PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
--	--	--

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)	EMERGENCY RESPONSE INFORMATION
T/S/D FACILITY NONE	CONTACT Name Bryant Riley
E.P.A. ID Code No.	Phone (614) 272-4401
Address	National Response Center 1-800-424-8802
Destination	in D. C. 426-2675

CERTIFICATION

for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature <i>Bryant Riley</i>	Bryant Riley, supervisor salvage	Date January 18, 1983
TRANSPORTER #1	Solvent Resource Recovery, Inc.	E.P.A. ID No. OHD093945293
Address	Box 453	
City	West Carrollton, Ohio 45449	State Zip Phone (513) 859-6101
Transporter No. 1 Signature <i>[Signature]</i>	This is to certify acceptance of the hazardous waste shipment.	
	Date 1/18/83	
TRANSPORTER #2	E.P.A. ID No.	
Address		
City	State Zip Phone	
Transporter No. 2 Signature	This is to certify acceptance of the hazardous waste shipment.	
	Date	
TREATMENT/STORAGE/DISPOSAL FACILITY		
T/S/D FACILITY Signature <i>[Signature]</i>	This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.	
	Date 1-18-83	

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

82 - 003

COLUMBUS STEEL DRUM No. 000476

TO:		FROM:	
T/S/D FACILITY	Columbus Steel Drum Co.	Generator	Columbus Products Co.
E.P.A. ID Code No.	MM OHD000723676	E.P.A. ID Code No.	OHD095030979
Address	1385 Blatt Blvd.	Address	300 Phillipi Road
Destination	Blacklick, Ohio 43004	Origin	Columbus, Ohio 43228
Phone	(614) 864-1900	Phone	(614) 272-4401

No. Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat I.D. No.	EPA Haz Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
124	Steel drums containing waste paint sludge	Flammable liquid	UN1993	F003	15100	Flammable

PLACARDS REQUIRED Flammable

<small>NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____</small>	<small>Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.</small>	FREIGHT CHARGES
	<small>(Signature of Consignee)</small>	PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any or, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)		EMERGENCY RESPONSE INFORMATION	
T/S/D FACILITY	none	CONTACT Name	Bryant Riley
E.P.A. ID Code No.		Phone	(614) 272-4401
Address		National Response Center	1-800-424-8802
Destination			in D. C. 426-2675

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature Bryant H. Riley Bryant H. Riley Date November 8, 1982

TRANSPORTER #1 Columbus Steel Drum Co. E.P.A. ID No. OHD000723676
Address 1385 Blatt Blvd.
City Blacklick, Ohio 43004 State Zip Phone (614) 864-1900

Transporter No. 1 This is to certify acceptance of the hazardous waste shipment.
Signature Randy Rutledge C.S.D. 11-8-82 Date November 8, 1982

TRANSPORTER #2 E.P.A. ID No.
Address
City State Zip Phone

Transporter No. 2 This is to certify acceptance of the hazardous waste shipment.
Signature Date

TREATMENT/STORAGE/DISPOSAL FACILITY
T/S/D FACILITY This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.
Signature Ronald Hanna Date 11-19-82

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

82 - 002

DAD 6:15 Am - 11:00 Am.

TO:	Systech Liquid Treatment	FROM:	
T/S/D FACILITY	c/o General Portland, Inc.	Generator	Columbus Products Co.
E.P.A. ID Code No.	OHD005048947	E.P.A. ID Code No.	OHD095030979
Address	Box 266	Address	300 Phillipi Rd.
Destination	Paulding, Ohio	Origin	Columbus, Ohio 43228
Phone	(419) 399-4835	Phone	(614) 272-4401

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat ID No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption No.)
BULK	Waste Paint Solvent	Flammable Liquid	UN1263 UN1993	F003	5100 GAL	(FLAMMABLE)

PLACARDS REQUIRED Flammable

NOTE: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
(Signature of Consignor) _____

FREIGHT CHARGES
PREPAID ☐ COLLECT ☐

RECEIVED: subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)		EMERGENCY RESPONSE INFORMATION	
T/S/D FACILITY	None	CONTACT Name	Bryant Riley
E.P.A. ID Code No.		Phone	(614) 272-4401
Address		National Response Center	1-800-424-8802
Destination			in D. C. 426-2675

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature	<i>Bryant Riley</i>	Bryant Riley, Suprv. Salvage	Date	October 8, 1982
TRANSPORTER #1	Ace Liquid Waste Haulers	E.P.A. ID No.	OHD017609900	
Address	3715 Beechmont Court			
City	Cincinnati, Ohio	State	Zip	Phone (513) 871-8397
Transporter No. 1	This is to certify acceptance of the hazardous waste shipment.			
Signature	<i>David A. Kuhl</i>	Date	October 8, 1982	
TRANSPORTER #2	E.P.A. ID No.			
Address				
City		State	Zip	Phone
Transporter No. 2	This is to certify acceptance of the hazardous waste shipment.			
Signature	Date			
TREATMENT/STORAGE/DISPOSAL FACILITY				
T/S/D FACILITY	This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.			
Signature	<i>T. Webb</i>	Date	10-8-82	

ORIGINAL - RETURN TO GENERATOR

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

81-020

TO:		FROM:	
T/S/D FACILITY	ENVIRONMENTAL ENTERPRISES	Generator	COLUMBUS PRODUCTS CO.
E.P.A. ID Code No.	OHD083377010	E.P.A. ID Code No.	OHD095030979
Address	10147 SPRINGFIELD PIKE	Address	300 PHILLIPI ROAD
Destination	CINCINNATI, OHIO 45215	Origin	COLUMBUS, OHIO 43228
Phone	(513) 772-2818	Phone	(614) 272-4401

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz. Mat. I.D. No.	EPA Haz. Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
16	WASTE PAINT & WASTE PAINT SOLVENT	FLAMMABLE LIQUID	UN1263	F003 F005	800 GAL	FLAMMABLE LIQUID
<div>WASTE SHIPMENT</div> <div>12-18-81</div> <div>RECEIVED</div>						

PLACARDS REQUIRED	FLAMMABLE
<small>NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____</small>	
<small>Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other tender charges.</small>	
FREIGHT CHARGES	PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
<small>(Signature of Consignee)</small>	

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)		EMERGENCY RESPONSE INFORMATION	
T/S/D FACILITY	NONE	CONTACT Name	RICHARD L. HUNTINGTON
E.P.A. ID Code No.		Phone	XXXXXXXXXX (614) 272-4468
Address		National Response Center	1-800-424-8802
Destination			in D. C. 426-2675

CERTIFICATION

This is to certify that the above described materials are properly classified, marked, labeled, packaged, and that the proper instructions for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature	<i>Bryant H. Riley</i>	BRYANT H. RILEY SUPRV.-SALVAGE	Date	DECEMBER 16, 1981
TRANSPORTER #1	ENVIRONMENTAL ENTERPRISES INC.		E.P.A. ID No.	OHD083377010
Address	10147 SPRINGFIELD PIKE			
City	CINCINNATI, OHIO 45215	State	Zip	Phone (513) 772-2818
Transporter No. 1	This is to certify acceptance of the hazardous waste shipment.			
Signature	<i>John Sturges</i>	Date	DECEMBER 16, 1981	
TRANSPORTER #2	E.P.A. ID No.			
Address				
City		State	Zip	Phone
Transporter No. 2	This is to certify acceptance of the hazardous waste shipment.			
Signature	Date			
TREATMENT/STORAGE/DISPOSAL FACILITY				
This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.				
T/S/D FACILITY				
Signature	<i>Larry M. Davis</i>	Date	12/16/81	

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

81 - 018

TO:	SYSTECH LIQUID TREATMENT	FROM:	
T/S/D FACILITY C/O	GENERAL PORTLAND INC.	Generator	COLUMBUS PRODUCTS CO.
E.P.A. ID Code No.	OHD005048947	E.P.A. ID Code No.	OHD095030979
Address	BOX 266	Address	300 PHILLIPI ROAD
Destination	PAULDING, OHIO	Origin	COLUMBUS, OHIO 43228
Phone	(419) 399-4835	Phone	(614) 272-4401

No. Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz. Mat. ID No.	EPA Haz Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
BULK 1	WASTE PAINT AND WASTE PAINT SOLVENT	FLAMMABLE LIQUID UN1263		F003	5500 GAL	FLAMMABLE LI
					42060 LB	

PLACARDS REQUIRED FLAMMABLE

NOTE - Where the rate is dependant on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____	Subject to Section 2 of the conditions, if this shipment is to be delivered to the consignee without recourse, on the consignee, the consignee shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignee)	FREIGHT CHARGES PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
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RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)	EMERGENCY RESPONSE INFORMATION
T/S/D FACILITY <u>NONE</u>	CONTACT Name <u>RICHARD L. HUNTINGTON</u>
E.P.A. ID Code No. _____	Phone <u>(614) 272-4468</u>
Address _____	National Response Center <u>1-800-424-8802</u>
Destination _____	in D. C. <u>426-2675</u>

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature <u>Bryant H. Riley</u>	BRYANT H. RILEY, SUPRV.-SALVAGE	Date <u>DECEMBER 9, 1981</u>
TRANSPORTER #1	ACE LIQUID WASTE HAULERS	E.P.A. ID No. <u>OHD017609900</u>
Address	3715 BEECHMONT CT.	
City	CINCINNATI, OHIO	State _____ Zip _____ Phone <u>(513) 871-8397</u>

Transporter No. 1 Signature <u>[Signature]</u>	This is to certify acceptance of the hazardous waste shipment.	Date <u>DECEMBER 9, 1981</u>
TRANSPORTER #2		E.P.A. ID No. _____
Address		
City		State _____ Zip _____ Phone _____

Transporter No. 2 Signature _____	This is to certify acceptance of the hazardous waste shipment.	Date _____
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TREATMENT/STORAGE/DISPOSAL FACILITY

T/S/D FACILITY	This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.	Date <u>12-10-81</u>
Signature <u>Craig A. Cape</u>		

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

MANIFEST DOCUMENT NUMBER

ORIGINAL - NOT NEGOTIABLE

81-016

TO:	FROM:
T/S/D FACILITY SOLVENT RESOURCE RECOVERY INC	Generator COLUMBUS PRODUCTS CO.
E.P.A. ID Code No. OHD093945293	E.P.A. ID Code No. OHD095030979
Address 4301 INFIRMARY ROAD	Address 300 PHILLIPI ROAD
Destination WEST CARROLTON, OHIO 45449	Origin COLUMBUS, OHIO 43228
Phone (513) 859-6101	Phone (614) 272-4401

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat ID No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption No.)
35	PAINT, SYNTHETIC ALKYD ENAMEL	FLAMMABLE LIQUID UN1263		F005	1750 GAL	FLAMMABLE LI
TOTAL GROSS WEIGHT 18900 LB.						

PLACARDS REQUIRED FLAMMABLE

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the carrier's part, the carrier shall sign the following statement:
The carrier shall not have delivery of this shipment without payment of freight and all other lawful charges.

FREIGHT CHARGES
PREPAID ☐ COLLECT ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)	EMERGENCY RESPONSE INFORMATION
T/S/D FACILITY NONE	CONTACT Name RICHARD L. HUNTINGTON
E.P.A. ID Code No.	Phone (614) 272-4468
Address	National Response Center 1-800-424-8802
Destination	in D. C. 426-2675

CERTIFICATION

This is to certify that the above named hazardous waste material has been properly classified, packaged, labeled and marked, and that it is being transported for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature <i>Bryant H. Riley</i>	BRYANT H. RILEY, SUPRV., SALVAGE	Date NOVEMBER 19, 1981
TRANSPORTER #1	SIDNEY TRUCK AND STORAGE	E.P.A. ID No. OHD007778103
Address	777 W. RUSSELL	
City	SIDNEY, OHIO	State Zip 45365 Phone 889-7485

Transporter No. 1 This is to certify acceptance of the hazardous waste shipment.
Signature *B. Dague* STS 11-19-81 Date NOVEMBER 19, 1981

TRANSPORTER #2	E.P.A. ID No.
Address	
City	State Zip Phone

Transporter No. 2 This is to certify acceptance of the hazardous waste shipment.
Signature _____ Date _____

TREATMENT/STORAGE/DISPOSAL FACILITY	
581839	
T/S/D FACILITY	
Signature <i>Tom</i>	Date 11-20-81

This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

81 - 015

TO:	FROM:
T/S/D FACILITY ROBERT ROSS & SONS INC.	Generator COLUMBUS PRODUCTS CO.
E.P.A. ID Code No. OHD048415665	E.P.A. ID Code No. OHD095030979
Address 394 GILES ROAD	Address 300 PHILLIPI ROAD
Destination GRAFTON, OHIO 44044	Origin COLUMBUS, OHIO 43228
Phone (216) 748-2171	Phone (614) 272-4401

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat I.D. No.	EPA Haz Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
31	TOLUENE DIISOCYANATE	POISON B	UN2078	U223	1550 GAL.	POISON

PLACARDS REQUIRED POISON

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse to the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

FREIGHT CHARGES

PREPAID COLLECT

☐☐

(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)

T/S/D FACILITY NONE
E.P.A. ID Code No. _____
Address _____
Destination _____

EMERGENCY RESPONSE INFORMATION

CONTACT Name RICHARD L. HUNTINGTON
Phone (614) 272-4468
National Response Center 1-800-424-8802
in D. C. 426-2675

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature *Bryant H. Riley* BRYANT H. RILEY
SUPERVISOR, SALVAGE Date NOVEMBER 2, 1981

TRANSPORTER #1 ROBERT ROSS & SONS INC. E.P.A. ID No. OHD048415665
Address 394 GILES ROAD
City GRAFTON, OHIO State Zip 44044 Phone (216) 748-2171

Transporter No. 1 This is to certify acceptance of the hazardous waste shipment. Date NOVEMBER 2, 1981
Signature *Richard E. Taylor*

TRANSPORTER #2 E.P.A. ID No. _____
Address _____
City _____ State Zip _____ Phone _____

Transporter No. 2 This is to certify acceptance of the hazardous waste shipment.
Signature _____ Date _____

TREATMENT/STORAGE/DISPOSAL FACILITY

This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.
T/S/D FACILITY Signature *Francis J. ...* Date 11-2-81

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

81-014

TO: SYSTECH LIQUID TREATMENT T/S/D FACILITY C/O GENERAL PORTLAND INC.		FROM: Generator COLUMBUS PRODUCTS CO.	
E.P.A. ID Code No. OHD005048947		E.P.A. ID Code No. OHD095030979	
Address BOX 266		Address 300 PHILLIPI ROAD	
Destination PAULDING, OHIO		Origin COLUMBUS, OHIO	
Phone (419) 399-4835		Phone (614) 272-4401	

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat I.D. No.	EPA Haz Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
1	WASTE PAINT & WASTE PAINT SOLVENT	FLAMMABLE	F003		5300 GAL 5300 GAL	

PLACARDS REQUIRED FLAMMABLE LIQUID

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignee)	FREIGHT CHARGES PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
--	--	--

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)		EMERGENCY RESPONSE INFORMATION	
T/S/D FACILITY NONE	CONTACT Name RICHARD L. HUNTINGTON	National Response Center 1-800-424-8802	
E.P.A. ID Code No.	Phone (614) 272-4468	in D. C. 426-2675	
Address			
Destination			

CERTIFICATION

This is to certify that the above described materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature <i>Bryant H. Riley</i>	BRYANT H. RILEY, SUPERV. SALVAGE	Date SEPTEMBER 15, 1981
--	----------------------------------	-------------------------

TRANSPORTER #1 ACE LIQUID WASTE	E.P.A. ID No. OHD017609900
Address 3715 BEECHMONT CT.	
City CINCINNATI, OHIO	State Zip Phone (513) 871-8397

Transporter No. <i>David A. Kuhl</i>	This is to certify acceptance of the hazardous waste shipment.
Signature <i>David A. Kuhl</i>	Date SEPTEMBER 15, 1981

TRANSPORTER #2	E.P.A. ID No.
Address	
City	State Zip Phone

Transporter No. 2	This is to certify acceptance of the hazardous waste shipment.
Signature	Date

TREATMENT/STORAGE/DISPOSAL FACILITY

T/S/D FACILITY	This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.
Signature <i>Craig D. Lape</i>	Date 9-15-81

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

81-013

TO:		FROM:	
T/S/D FACILITY SOLVENT RESOURCE RECOVERY INC		Generator COLUMBUS PRODUCTS CO.	
E.P.A. ID Code No. OHD093945293		E.P.A. ID Code No. OHD095030979	
Address 4301 INFIRMARY ROAD		Address 300 PHILLIPI ROAD	
Destination WEST CARROLTON, OHIO 45449		Origin COLUMBUS, OHIO 43228	
Phone (513) 859-6101		Phone (614) 272-4401	

No Shipping Units	D O T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat ID No	EPA Haz Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
1	SPENT METHYLENE CHLORIDE			F002	8000 LB	(1000 GAL)

PLACARDS REQUIRED

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.	FREIGHT CHARGES
	<input type="checkbox"/> PREPAID <input type="checkbox"/> COLLECT	

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)		EMERGENCY RESPONSE INFORMATION	
T/S/D FACILITY NONE		CONTACT Name RICHARD L. HUNTINGTON	
E.P.A. ID Code No.		Phone (614) 272-4468	
Address		National Response Center 1-800-424-8802	
Destination		in D. C. 426-2675	

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature *Bryant H. Riley* BRYANT H. RILEY, SUPERVISOR - SALVAGE Date SEPTEMBER 10, 1981

TRANSPORTER #1 SOLVENT RESOURCE RECOVERY INC. E.P.A. ID No. OHD093945293
Address P.O. BOX 453
City WEST CARROLTON, OHIO 45449 State Zip Phone (513) 859-6101

Transporter No. *1* This is to certify acceptance of the hazardous waste shipment.
Signature *[Signature]* Date SEPTEMBER 10, 1981

TRANSPORTER #2 E.P.A. ID No.
Address
City State Zip Phone

Transporter No. 2 This is to certify acceptance of the hazardous waste shipment.
Signature Date

TREATMENT/STORAGE/DISPOSAL FACILITY
T/S/D FACILITY This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.
Signature *Kern B...* Date 9/10/81

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

81-011

TO:	FROM:
T/S/D FACILITY COLUMBUS STEEL DRUM CO.	Generator COLUMBUS PRODUCTS COMPANY
E.P.A. ID Code No. OHD000723676	E.P.A. ID Code No. OHD095030979
Address 1385 BLATT BLVD.	Address 300 PHILLIPS ROAD
Destination BLACKLICK, OHIO 43004	Origin COLUMBUS, OHIO 43228
Phone (614) 864-1900	Phone (614) 272-4401

No. Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz. Mat. ID No.	EPA Haz. Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
59	WASTE PAINT (XYLENE SOLVENT BASE)	FLAMMABLE		F003	1846 LB.	FLAMMABLE

PLACARDS REQUIRED FLAMMABLE LIQUID

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignee shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

FREIGHT CHARGES

PREPAID COLLECT



(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)	EMERGENCY RESPONSE INFORMATION
T/S/D FACILITY NONE	CONTACT Name RICHARD L. HUNTINGTON
E.P.A. ID Code No.	Phone (614) 272-4468
Address	National Response Center 1-800-424-8802
Destination	in D. C. 426-2675

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature <i>Bryant H. Riley</i>	BRYANT H. RILEY, SUPERV.- SALVAGE Date JUNE 23, 1981
TRANSPORTER #1 COLUMBUS STEEL DRUM CO.	E.P.A. ID No. OHD 000723676
Address 1385 BLATT BLVD.	
City BLACKLICK, OHIO 43004	State Zip Phone (614) 864-1900

Transporter No. 1 This is to certify acceptance of the hazardous waste shipment. Date JUNE 23, 1981

TRANSPORTER #2 <i>Randy D. Dube</i>	E.P.A. ID No.
Address	
City	State Zip Phone

Transporter No. 2 This is to certify acceptance of the hazardous waste shipment. Date

TREATMENT/STORAGE/DISPOSAL FACILITY
T/S/D FACILITY This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.
Signature <i>Donald J. Parnas</i> Date 6-30-81

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

81-010

TO:	FROM:
T/S/D FACILITY SOLVENT RESOURCE RECOVERY INC.	Generator COLUMBUS PRODUCTS CO.
E.P.A. ID Code No. OHD093945293	E.P.A. ID Code No. OHD095030979
Address 4301 INFIRMARY ROAD	Address 300 PHILLIPI ROAD
Destination WEST CARROLTON, OHIO 45449	Origin COLUMBUS, OHIO 43228
Phone (513) 859-6101	Phone (614) 272-4401

No. Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz. Mat. ID No.	EPA Haz Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
1	SPENT 1,1,1 TRICHLOROETHANE			F001	5936 LB	

PLACARDS REQUIRED

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignee)	FREIGHT CHARGES PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, it on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.		

ALTERNATE DESTINATION (EMERGENCY ONLY)	EMERGENCY RESPONSE INFORMATION
T/S/D FACILITY NONE	CONTACT Name RICHARD L. HUNTINGTON
E.P.A. ID Code No.	Phone (614) 272-4468
Address	National Response Center 1-800-424-8802
Destination	in D. C. 426-2675

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature <i>Bryant H. Riley</i>	BRYANT H. RILEY SUPERV. - SALVAGE	Date JUNE 16, 1981
--	-----------------------------------	--------------------

TRANSPORTER #1 ACE LIQUID WASTE HAULERS	E.P.A. ID No. OHD017609900
Address 3715 BEECHMONT COURT	
City CINCINNATI, OHIO	State Zip Phone (513) 871-8997

Transporter No. 1 *David A. Kull* This is to certify acceptance of the hazardous waste shipment. Date JUNE 16, 1981

TRANSPORTER #2	E.P.A. ID No.
Address	
City	State Zip Phone

Transporter No. 2 This is to certify acceptance of the hazardous waste shipment. Date

TREATMENT/STORAGE/DISPOSAL FACILITY
T/S/D FACILITY
Signature <i>M. Z...</i> This is to certify acceptance of the hazardous waste for treatment, storage, or disposal. Date 6-16-81

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

81-009

TO: T/S/D FACILITY SOLVENT RESOURCE RECOVERY INC.		FROM: Generator COLUMBUS PRODUCTS CO.	
E.P.A. ID Code No. OHD093945293		E.P.A. ID Code No. OHD095030979	
Address 4301 INFIRMARY ROAD		Address 300 PHILLIPI ROAD	
Destination WEST CARROLTON, OHIO 45449		Origin COLUMBUS, OHIO 43228	
Phone (513) 859-6101		Phone (614) 272-4401	

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz Mat ID No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption No.)
1	SPENT METHYLENE CHLORIDE			F002	18400 LB	

PLACARDS REQUIRED

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignor) _____	FREIGHT CHARGES PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
--	--	--

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property, over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)		EMERGENCY RESPONSE INFORMATION	
T/S/D FACILITY NONE		CONTACT Name RICHARD L. HUNTINGTON	
E.P.A. ID Code No.		Phone (614) 272-4468	
Address		National Response Center 1-800-424-8802	
Destination		in D. C. 426-2675	

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature <i>Bryant H. Riley</i>	BRYANT H. RILEY, SUPERVISOR- SALVAGE	Date JUNE 16, 1981
--	--------------------------------------	--------------------

TRANSPORTER #1 ACE LIQUID WASTE HAULERS	E.P.A. ID No. OHD017609900
Address 3715 BEECHMONT COURT	
City CINCINNATI, OHIO	State Zip Phone (513) 871-8397

Transporter No. 1 Signature <i>David A. Kull</i>	This is to certify acceptance of the hazardous waste shipment.	Date JUNE 16, 1981
--	--	--------------------

TRANSPORTER #2	E.P.A. ID No.
Address	
City	State Zip Phone

Transporter No. 2 Signature	This is to certify acceptance of the hazardous waste shipment.	Date
-----------------------------	--	------

TREATMENT/STORAGE/DISPOSAL FACILITY

T/S/D FACILITY	This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.
Signature <i>M. J. Z...</i>	Date 6/16-81

ORIGINAL - RETURN TO GENERATOR

1981

HAZARDOUS WASTE MANIFEST

THIS SHIPPING ORDER

must be legibly filled in, in ink, on detachable Permit, or in Carbon, and retained by the Agent.

MANIFEST DOCUMENT NUMBER

81-007

TO: SYSTECH LIQUID TREATMENT T/S/D FACILITY C/O GENERAL PORTLAND INC.		FROM: Generator COLUMBUS PRODUCTS CO.	
E.P.A. ID Code No. OHD005048947		E.P.A. ID Code No. OHD095030979	
Address BOX 266		Address 300 PHILLIPS RD.	
Destination PAULDING, OHIO		Origin COLUMBUS, OHIO 43228	
Phone (614) 390-4835		Phone (614) 272-4401	

No Shipping Units	D.O.T. PROPER SHIPPING NAME	HAZARD CLASS	Haz. Mat ID No.	EPA Haz Waste No.	WEIGHT	LABELS REQUIRED (or Exemption No.)
1	WASTE PAINT AND WASTE PAINT SOLVENT	FLAMMABLE	F003		48000 5,000 gal	

PLACARDS REQUIRED **FLAMMABLE LIQUID**

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse to the shipper, the shipper shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.	FREIGHT CHARGES PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
--	--	--

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, it on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

ALTERNATE DESTINATION (EMERGENCY ONLY)	EMERGENCY RESPONSE INFORMATION
T/S/D FACILITY NONE	CONTACT Name RICHARD L. HUNTINGTON
E.P.A. ID Code No. _____	Phone (614) 272-4468
Address _____	National Response Center 1-800-424-8802
Destination _____	in D. C. 426-2675

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the E.P.A.

Generator Signature <i>Bryant H. Riley</i>	BRYANT H. RILEY SUPERVISOR - SALVAGE	Date JUNE 8, 1981
TRANSPORTER #1	ACE LIQUID WASTE	E.P.A. ID No. OH0017609900
Address 3715 BEECHMONT CT.	City CINCINNATI	State OHIO Zip _____ Phone (513) 871-8397

Transporter No. 1 Signature <i>Dan D. Kull</i>	This is to certify acceptance of the hazardous waste shipment.	Date JUNE 8, 1981
--	--	--------------------------

TRANSPORTER #2	E.P.A. ID No. _____
Address _____	City _____ State _____ Zip _____ Phone _____

Transporter No. 2 Signature _____	This is to certify acceptance of the hazardous waste shipment.	Date _____
-----------------------------------	--	------------

TREATMENT/STORAGE/DISPOSAL FACILITY
T/S/D FACILITY Signature <i>Raymond</i>
This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.
Date 6-9-81

TRANSPORTER #2 COPY

logged in
Re: Application Number 81-HW-505
Franklin County

September 9, 1981

RECEIVED

SEP 14 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

Richard Huntington, Manufacturing Engineer
Columbus Products Company
300 Phillipi Road
Columbus, Ohio 43228

Dear Mr. Huntington:

On April 23, 1981, Ken Humphrey of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed is a copy of the report completed when your facility was inspected. This form illustrates those areas inspected at your facility for compliance with Interim Status Standards.

The following is a list of items found to be in violation of current regulations or those areas which will be covered by regulations not yet effective. The capital letter codes found to the left of each item are explained on the last page of the enclosed inspection form.

Subpart B: General Facility Standards

<u>CODE</u>	<u>ITEM</u>	<u>PAGE NO.</u>
B	1 b)	P. 3-1 Refer to ISS Remark No. 4
B	1 c)	P. 3-1 Refer to ISS Remark No. 5
A	1 e)	P. 3-2 Refer to ISS Remark No. 6
A	1 f)	P. 3-2 Refer to ISS Remark No. 6
B	1 g) 2.	P. 3-3 Refer to ISS Remark No. 7
B	1 g) 3.	P. 3-3 Refer to ISS Remark No. 8

Subpart D: Contingency and Emergency

<u>CODE</u>	<u>ITEM</u>	<u>PAGE NO.</u>
B	3 a) 3.	P. 3-5 Refer to ISS Remark No. 14
B	a) 5.	P. 3-5 Refer to ISS Remark No. 15
B	b)	P. 3-6 Refer to ISS Remark No. 16
B	c)	P. 3-6 Refer to ISS Remark No. 16

Richard Huntington
Columbus Products Company
September 9, 1981
Page 2

Partial Subpart G: Closure

<u>CODE</u>	<u>ITEM</u>	<u>PAGE NO.</u>	
A	4 a)	3-7	Refer to ISS Remark No. 18. *Note: Must have closure <u>estimate</u> also.

Subpart I: Management of Containers

<u>CODE</u>	<u>ITEM</u>	<u>PAGE NO.</u>	
B	1	4-1	
B	1 b)	4-1	Refer to ISS Remark No. 19
B	1 e)	4-1	Refer to ISS Remark No. 7

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Office of Hazardous Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Ken Humphrey, CDO

CERTIFIED MAIL



Re: Franklin County
OHD095030979

May 21, 1981

Mr. Richard L. Huntington
Senior Manufacturing Engineer
Columbus Products Co.
300 Phillipi Road
Columbus, Ohio 43228

Dear Mr. Huntington:

My letter of May 5, 1981 regarding the results of the recently performed Resource Conservation and Recovery Act Interim Status Inspection did not contain all of the information about the inspection that it should have contained. The purpose of this letter is to correct that situation.

The previous letter should have noted that the inspection of the Columbus Products Company, Phillipi Road Facility was conducted on April 23, 1981 by Kenneth L. Humphrey of Ohio EPA and that Columbus Products was represented by John H. Park, Tom C. Huff and yourself. The letter also included a list of areas in which Columbus Product's may be out of compliance with the requirements of the RCRA regulations; that list was complete.

Please excuse the oversights on my previous letter; feel free to call if you have any questions.

Sincerely,

A handwritten signature in black ink, reading "KL Humphrey", is written over the typed name.

Kenneth L. Humphrey
Hazardous Waste Scientist
Central District Office

KLH/sc

cc: Franklin County Health Department
cc: Mr. Don Day, Chief, OLPC
cc: Mr. Steve White, Acting Chief, OHMM
cc: Ms. Brenda Lillstrom SIO, U.S. EPA, Region V
cc: Ms. Frances Brunet, U.S. EPA, Region V

PART 1. GENERAL INFORMATION

U.S. EPA IDENTIFICATION NUMBER:

0 H D 0 9 5 0 3 0 9 7 9

Facility: Columbus Products Company

Address: 300 Phillipi Road

City: Columbus State: Ohio Zip Code: 43228

Telephone: 614-272-4000 County: Franklin

Facility Operator: G.F. Diekmann

Title: President Telephone: 614-272-4107

Facility Owner: White Consolidated Industries

Address: 11770 Berea Road

City: Cleveland State: Ohio Zip Code: 44111

Telephone: 216-252-3700 County:

Type of Ownership: ☒ Private ☐ Government

Date of Inspection: 4/23/81 Time of Inspection:

Advance Notification? ☐ No (Start) 9:00 am☒ Yes: Called 4:00 pm, 4/22/81 (Finish) 2:00 pm

Weather Conditions: Rainy, 62°F

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Richard Huntington	Sr. Mfg. Engineer	614-272-4468
2.	John H. Park	Mgr. Plant Eng.	614-272-4225
3.	Tom C. Huff	Safety Supervisor	614-272-4287
4.			

Ohio EPA

Re: Franklin County
OHD095030979
HWFAB 01-25-0505

RECEIVED

WASTE MANAGEMENT BRANCH
April 23, 1982

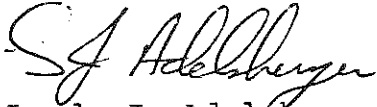
Mr. Richard Huntington
Senior Manufacturing Engineer
Columbus Products Company
300 Phillipi Road
Columbus, Ohio 43228

Dear Mr. Huntington:

Thank you for your written response to my letter of March 12, 1982, regarding the RCRA Interim Status Inspection conducted at the Columbus Products Company. The additional information you submitted should satisfactorily resolve the deficiencies listed in the March 3, 1982, Inspection Report. This office considers the 12 deficiencies cited in that report to be satisfactorily corrected, subject to verification by a reinspection of the facility, if necessary.

Once again, thank you for the time and effort you have expended to resolve this matter. Please feel free to contact me at 614-466-6450.

Sincerely,



Lundy J. Adelsberger
Environmental Scientist
Hazardous Materials
Central District Office

LJA/sc

cc: Ms. Kathleen Homer, SIO, U.S. EPA, Region V
cc: Mr. Bob Fragale, Technical Permits Section, HWFAB
cc: Ms. Paula Cotter, Inspections/Enforcement, DHM, C.O.



Re: Franklin County
OHD095030979
HWFAB 01-25-0505

Mr. H. A. Almy, Director
Factory Engineering and Services
Columbus Products Company
300 Phillippi Road
Columbus, Ohio 43228

November 9, 1982

Dear Mr. Almy:

On October 25, 1982, Columbus Products Company was reinspected by the Ohio Environmental Protection Agency to determine if it was in compliance with Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act (RCRA, Public Law 94-580).

The enclosed inspection report is self explanatory and contains recommendations for correcting the deficiencies found during the inspection. This office requests that you provide a written response, within thirty days, to the following deficiencies/comments contained in the enclosed inspection report:

<u>PAGE</u>	<u>QUESTION NUMBER</u>	<u>REQUIREMENT</u>
2-2	5c	Placards
2-2	8, 9	Personnel Training
3-2	1d, 3	Contingency Plan
5-1	4	Container Inspection

Please call (614-864-3195) if you have any questions regarding the inspection or RCRA regulations.

Sincerely,

Lundy J. Adelsberger
Environmental Engineer
Division of Hazardous Materials Management
Central District Office

LJA/sc

cc: Ms. Kathleen Homer, SIO, U.S. EPA, Region V
cc: Ms. Paula Cotter, Compliance Unit, DHMM, C.O.

Enclosure

RECEIVED

NOV 12 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

RCRA Inspection Report

EPA Identification Number OH D095030979

HWFAB Permit Number (if appropriate) 01-25-0505

Facility Name Columbus Products Company

Location 300 Phillippi Road

Columbus, Ohio 43228

Person(s) Interviewed	Title	Telephone
<u>Mr. H. A. Almy</u>	<u>Director, Factory Engineering</u>	
<u>Mr. Steve Ross</u>	<u>Superintendent of Maintenance</u>	<u>(614) 272-4432</u>
<u>Mr. Bryant Riley</u>	<u>Supervisor of Salvage</u>	<u>(614) 272-4436</u>

Inspector(s)	Agency/Title	Telephone
<u>Mr. Lundy Adelsberger</u>	<u>Ohio EPA EE II</u>	<u>(614) 864-3195</u>
	<u>Ohio EPA</u>	
	<u>Ohio EPA</u>	

Installation Activity

Mark One

- ☒ Generator only (G)
- ☐ Transporter only (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80

If the site is a TSDF, check the boxes indicating which forms were used -

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- ☐ Groundwater Monitoring
- ☐ Closure and Post-Closure
- ☐ Financial Requirements
- ☒ Containers S01
- ☐ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment T03
- ☐ Chemical/Physical/Biological T04

October 25, 1982

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 01-25-0505

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OHD095030979

Facility: Columbus Products
Company

Address: 300 Phillipi Road

City: Columbus

State: Ohio

Zip Code: 43228

County: Franklin

Telephone: (614) 272-4000

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	Mr. Bryant Riley	Supervisor of Salvage	(614) 272-4436
2.	Mr. Steve Ross	Superintendent of Maintenance	(614) 272-4432
3.	Mr. H. A. Almy	Director, Factory Engineering & Services	

INSPECTOR(S)

1.	Mr. Lundy Adelsberger	Environmental Scientist	(614) 864-3195
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☒ Generator only (G)
 >90 Day Storage
☐ Transporter (T)
☐ TSDF only
☐ G-T
☐ G-TSDF
☐ T-TSDF
☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- | | |
|--|---|
| <input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03 |
| <input checked="" type="checkbox"/> Containers S01 | <input type="checkbox"/> Land Treatment D81 |
| <input type="checkbox"/> Tanks S02/T01 | <input type="checkbox"/> Landfills D80 |
| <input type="checkbox"/> Surface Impoundments S04/T02 | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> Incineration/Thermal Treatment | <input type="checkbox"/> Groundwater Monitoring |
| | <input type="checkbox"/> Post-Closure |

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 2</u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

1. Columbus Products has designated the following wastes as hazardous:

Listed Wastes: F002; Methylene Chloride and 1,1,1-Trichloroethane, both recycled by Solvent Resources Recovery.

U223; Toluene diisocyanate, any TDI which is out-of-date, off-spec and intended for discarde is didposed of at a permitted disposal facility.

Wastes identified in Subpart C by applying a knowledge of their hazard characteristic:

D001; obsolete paint, contracted to Systech Liquid Treatment Corporation for disposal.

D002 & D007; chromic acid sludge, also contracted to Systech Liquid Treatment Corporation for disposal.

D002; spent pickle liquor and spent chromic acid are neutralized prior to being discharged to the sanitary sewer.

2. The facility has an industrial wastewater treatment unit which processes the spent pickle liquor and spent chromic acid prior to discharge to the sanitary sewer of an NPDES permitted facility.
3. The generator should be able to provide the transporter with the appropriate placards prior to the transporting of their hazardous waste off-site.
4. Facility personnel must successfully complete a training program that will instruct them in the proper handling of hazardous waste. The Personnel Training Program must be in compliance with 40 CFR Part 265.16(a)(b)(c).
5. The records required by 40 CFR Part 265.16(d)(e) must be maintained at the facility.

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	<u> </u>	<u> X </u>	<u> </u>	<u> </u>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
c) Portable fire control equipment.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

Revised 9/15/82

SUBPART D REMARKS

6. The Contingency Plan must include a list of the emergency equipment and be in compliance with 40 CFR Part 265.52(e).
7. The Contingency Plan must be revised when necessary as per 40 CFR Part 265.54.

RCRA INTER... STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) In good physical condition (265.171)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Compatible with the wastes stored in them (265.172)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	<u> </u>	<u>X</u>	<u> </u>	<u>No. 8</u>
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

SUBPART I REMARKS

8. These inspections must be performed in compliance with 40 CFR Part 265.174.

Ohio EPA

Re: Franklin County
OHD095030979
HWFAB 01-25-0505

RECEIVED

MAR 17 1982

WASTE MANAGEMENT BRANCH
EPA REGION

March 12, 1982

Mr. Richard Huntington
Senior Manufacturing Engineer
Columbus Products Company
300 Phillipi Road
Columbus, Ohio 43228

Dear Mr. Huntington:

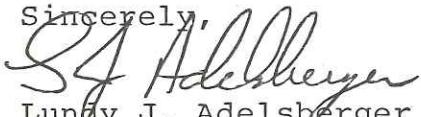
On March 3, 1982, your facility was reinspected by the Ohio Environmental Protection Agency to determine if it was in compliance with Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act (RCRA, Public Law 94-580).

The enclosed inspection report is self-explanatory and contains recommendations for correcting the deficiencies found during the inspection. This office requests that you provide a written response, within thirty days, to the following deficiencies/ comments contained in the enclosed inspection report:

<u>PAGE</u>	<u>QUESTION NUMBER</u>	<u>REQUIREMENT</u>
4-2	4c, 4f, 4g	Inspection Plan
4-2	6	Employee Training
4-4	2	Contingency Plan
4-5	1a - 1d	Operating Record
4-8	1e	Closure Plan
4-10	1	Closure Cost Estimate
5-1	2	Management of Containers

Please call (614-466-6450) if you have any questions regarding the inspection or RCRA regulations.

Sincerely,


Lundy J. Adelsberger
Environmental Scientist
Hazardous Materials
Central District Office

LJA/sc

cc: Ms. Kathleen Homer, SIO, U.S. EPA, Region V
cc: Mr. Bob Fragale, Technical Permits Section, HWFAB, Ohio EPA, CO
cc: Ms. Paula Cotter, Inspections/Enforcement, DHM, Ohio EPA, C.O.

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD095030979

Facility: Columbus Products Company Address: 300 Phillipi Road
 City: Columbus State: Ohio Zip Code: 43228 Telephone: (614) 272-4000
 Facility Operator: G.F. Diekman Title: President Telephone: (614) 272-4000
 Facility Owner: White Consolidated Industries Address: 11770 Berea Road
 City: Cleveland State: Ohio Zip Code: 44111 Telephone: (216) 252-3700
 Type of Ownership: X Private Government State HWFAB No. 01-25-0505
 Date of Inspection: March 3, 1982 Time of Inspection: (Start) 10:00 AM (Finish) 1:00 PM
 Advance Notification? No X Yes: Telephone 2/22/82
 Weather Conditions: Sunny - Cold
 County: Franklin

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Mr. Richard Huntington</u>	<u>Senior Manufacturing Engineer</u>	<u>(614) 272-4468</u>
2.	<u> </u>	<u> </u>	<u> </u>
3.	<u> </u>	<u> </u>	<u> </u>
4.	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Mr. Lundy Adelsberger	Environmental Scientist	614-466-6450
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☒ Treatment
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F002 (Methylene Chloride, 1,1,1-Trichloroethane),
K062 (Spent Pickle Liquor)

b) Non-Listed Wastes: ☒ I ☐ C ☐ R ☐ E
D001 D002 D003 D004-D017
Obsolete Paint (Ignitable), U223 (Toluenediisocyanate)

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?
☐ Yes, See Remark # ☐ ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) X No

a) P.U.C.O. Registration Number _____

7. A brief description of site activity:

The manufacture of refrigerators and dishwashers.

Site Activity:		S	T	D
Containers	I	X		
Tanks	J			
Surf. Imp.	K			
Waste Pile	L			
Land Treat.	M			
Landfill	N			
Incineration	O			
Thermal Treat.	P			
Chem/Phys/Biol	Q			
Under. Inj.	R			

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<u>X</u>	_____	_____	_____
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<u>X</u>	_____	_____	_____
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<u>X</u>	_____	_____	_____
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<u>X</u>	_____	_____	_____
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<u>X</u>	_____	_____	_____
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<u>X</u>	_____	_____	_____
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<u>X</u>	_____	_____	_____
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	_____	_____	<u>X</u>	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	_____	_____	<u>X</u>	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	_____	_____	<u>X</u>	_____
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	_____	_____	<u>X</u>	_____
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	_____	_____	<u>X</u>	_____
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	_____	_____	<u>X</u>	_____
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	_____	_____	<u>X</u>	_____
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	_____	_____	<u>X</u>	_____
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a) and 3745-53-30-A).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
9. Does the transporter store hazardous wastes temporarily while they are in transit?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency

E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<u>X</u>	_____	_____	_____
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<u>X</u>	_____	_____	_____
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<u>X</u>	_____	_____	_____
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<u>X</u>	_____	_____	_____
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<u>X</u>	_____	_____	_____
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<u> </u>	<u> X </u>	<u> </u>	<u> </u>
a) Inspect emergency equipment.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
b) Inspect monitoring equipment.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
c) Inspect security, alarm and communications devices.	<u> </u>	<u> X </u>	<u> </u>	<u> No. 1 </u>
d) Inspect process equipment (pipes, pumps, etc.).	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
e) Inspect containment structures (dikes, curbs, etc.).	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<u> </u>	<u> X </u>	<u> </u>	<u> No. 2 </u>
g) Inspect hazardous waste handling/loading areas each day used.	<u> </u>	<u> X </u>	<u> </u>	<u> No. 3 </u>
h) Record of any malfunctions due to equipment or operator errors.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
i) Record of any hazardous waste discharges.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<u> </u>	<u> X </u>	<u> </u>	<u> No. 4 </u>
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<u> X </u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) Physical separation of incompatible waste materials.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
a) Internal alarm system	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Portable fire control equipment.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<u>X</u>	_____	_____	_____
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<u>X</u>	_____	_____	_____
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	_____	_____	<u>X</u>	_____

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<u>X</u>	_____	_____	_____
a) Actions to be taken by personnel in the event of an emergency incident.	<u>X</u>	_____	_____	_____
b) Arrangements or agreements with local or state emergency authorities.	<u>X</u>	_____	_____	_____
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u>X</u>	_____	_____	_____
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u>X</u>	_____	_____	_____
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<u>X</u>	_____	_____	_____
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	_____	<u>X</u>	_____	<u>No. 5</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<u> </u>	<u>X</u>	<u> </u>	<u>No. 6</u>
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 6</u>
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 6</u>
c) The estimated (or actual) weight, volume or density of the waste material(s).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 6</u>
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 6</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<u>X</u>	___	___	___
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	___	___	<u>X</u>	___
g) Records of any waste analyses and trial tests required to be performed.	<u>X</u>	___	___	___
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	___	___	<u>X</u>	___
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	___	___	<u>X</u>	___
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	___	___	<u>X</u>	___
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	___	___	<u>X</u>	___

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	___	___	<u>X</u>	___
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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	___	___	<u>X</u>	___
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RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	___	___	<u>X</u>	___
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	___	___	<u>X</u>	___
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	___	___	<u>X</u>	___
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	___	___	<u>X</u>	___

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	___	___	<u>X</u>	___

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u> </u>	<u>X</u>	<u> </u>	<u>No. 7</u>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) A description of steps taken to decontaminate facility equipment.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 7</u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.	_____	_____	<u>X</u>	_____

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	_____	<u>X</u>	_____	<u>No. 8</u>
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NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL APRIL 13, 1982 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

1. The inspection of security, alarm and communications devices must be documented as required by 265.15(d).
2. The operating record must contain a documented inspection of the facility for structural malfunctions.
3. Hazardous waste handling/loading areas must be inspected each day they are used and the inspection must be documented in the operating record log.
4. The Operator Training Program record must contain a job description for each employee as well as documented employee training dates.
5. A copy of the Contingency Plan must be submitted to all local police departments, fire departments and hospitals.
6. The operating record must contain an up to date description and quantity of each hazardous waste treated, stored or disposed of including EPA Hazardous Waste Identification Numbers (FO-) and EPA Handling Codes (SO-) as required by 265.73.
7. The Closure Plan must contain an estimate of the expected year of closure or the statement "This facility does not intend to close".
8. The Closure Plan must have a written estimate of the costs of closing the facility as required by 265.142.

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	<u>X</u>	_____	_____	_____
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	_____	<u>X</u>	_____	<u>No. 9</u>

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<u>X</u>	_____	_____	_____
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	_____	_____	<u>X</u>	_____

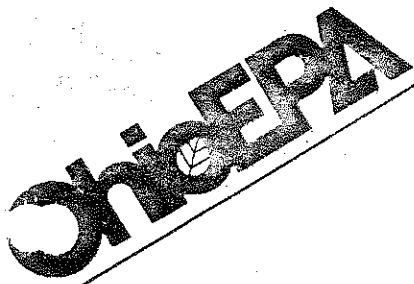
Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	_____	_____	_____	_____
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	_____	_____	_____	_____
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	_____	_____	_____	_____
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	_____	_____	_____	_____
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).	_____	_____	_____	_____
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	_____	_____	_____	_____
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

REMARKS, PART 5, (TREATMENT/STORAGE/DISPOSAL)

9. The hazardous waste drum storage area must be inspected weekly and this inspection must be documented as required by 265.174.



Re: Franklin County
OHD095030979

Mr. Richard L. Huntington
Senior Manufacturing Engineer
Columbus Products Company
300 Phillipi Road
Columbus, Ohio 43228

May 5, 1981

Dear Mr. Huntington:

The Ohio Environmental Protection Agency is cooperating with the U.S. EPA Region V in carrying out the provisions of the Resource Conservation and Recovery Act of 1976 (RCRA) Public Law 94-580. In this effort personnel of the Ohio EPA are conducting inspections of facilities in Ohio that are engaged in the generation, transportation, storage, treatment or disposal of hazardous waste materials.

SECTION 262, GENERATOR REQUIREMENTS

1. A shipment of waste solvent (methylene chloride and 1,1,1,-trichloroethane) was shipped to a solvent reclaimer during February of 1981. Because these solvents are listed under EPA Hazardous Waste Category No. F002, the storage and transportation prior to reclamation is fully regulated as per Section 261.6(b). The shipping paper provided by Solvent Resource Recovery lacked the U.S. EPA identification numbers of the generator and the transporter and therefore did not contain all of the information required to be on a hazardous waste manifest by Section 262.21(a).

SECTION 265, SUBPART B (GENERAL FACILITY STANDARDS)

1. A written waste analysis plan, as required by Section 265.13(b) was not available. It was noted that frequent chemical analysis of the K062 pickle liquor is part of standard shop procedure and that the waste methylene chloride and 1,1,1,-trichloroethane solvents have properties which are essentially identical to virgin material.
2. "Danger-Authorized Personnel Only" signs required by Section 265.14(c) were not posted in the immediate vicinity of the hazardous waste storage area.
3. No special arrangements have been made to incorporate the employee training requirements of Section 265.16 into the existing employee training program. The present training program instructs in the safe handling of solvents as raw material rather than waste materials, and may only need minor modification and some additional recordkeeping to be in compliance.

4. The waste storage area and raw material storage area are located next to each other and may require the physical separation of incompatible materials as specified in Section 261.17.
5. If ignitable waste materials will be stored in the hazardous waste storage area, "No Smoking" "No Open Flames" signs are required under Section 261.17.

SECTION 265, SUBPART D (CONTINGENCY AND EMERGENCY)

1. The existing Contingency Plan specifies personnel to be contacted, but not all of these people would meet the minimum requirements of the Emergency Coordinator required by Section 265.51. The designated RCRA Emergency Coordinator should be specifically identified.
2. The existing plant evacuation plan does not specifically address the storage of hazardous waste as required by Section 265.51(f).

SECTION 265, SUBPART I (MANAGEMENT OF CONTAINERS)

1. The area where containers are stored is not being formally checked for leaks and corrosion at least weekly as required by Section 265.174. Personnel working in the general area presently make informal daily checks.

A copy of this letter and the inspection report will be sent to the U.S. EPA Region V Office in Chicago. Any enforcement action related to this inspection will be initiated by U.S. EPA's Enforcement Division; in that case U.S. EPA will contact you. If you have any questions, please contact me (614-466-6450) or Ms. Brenda Lillstrom (312-353-3899) of the U.S. EPA, Region V.

Sincerely,



Kenneth L. Humphrey
Hazardous Waste Scientist
Central District Office

KLH/sc

cc: Franklin County Health Department
cc: Mr. Don Day, Chief, OLPC, C.O.
cc: Mr. Steve White, Acting Chief, OHM, C.O.
cc: Ms. Brenda Lillstrom, U.S. EPA, Region V

RCRA ITERIM STATUS INSPECTION FORM

INSPECTOR(S)

(Name)

(Title)

(Telephone)

- | | | | |
|----|------------------------|---------------------------|--------------|
| 1. | Ken Humphrey, Ohio EPA | Hazardous Waste Scientist | 614-466-6450 |
| 2. | | | |
| 3. | | | |
| 4. | | | |

1. Type(s) of hazardous waste site activity:

A. X Generation

B. X Storage

C. X Treatment

D. Disposal

E. X Off-Site Transportation

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F002 (Methylene Chloride, 1,1,1-Trichloroethane),
K062 (Spent Pickle Liquor), U223 (Toluenediisocyanate) See Remark No. 1

b) Non-Listed Wastes: $\frac{X}{D001}$ $\frac{I}{D002}$ $\frac{C}{D003}$ $\frac{R}{D000}$ $\frac{T}{D000}$

Obsolete Paint (Ignitable) See Remark No. 1

3. Has this facility submitted a Part A Permit Application? X Yes No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

 Yes, See Remark # X No

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Part 263 applies X No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

REMARKS, PART 1. GENERAL INFORMATION

No. 1 Columbus Products is presently storing on-site about 17-20 drums of obsolete toluenediisocyanate and some obsolete unused paint; both of these materials are regarded as usable raw materials at this time, but may become waste materials at some point in the future. Since these materials are not now wastes, their storage is not subject to regulation under RCRA.

PART 2. GENERATOR REQUIREMENTS (Section 262)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 in compliance with the requirements of Section 262.11.	<u>X</u>	_____	_____	_____
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 (statutory exclusions) or 261.6 (recycle, reuse)?	<u>X</u>	_____	_____	<u>No. 1</u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10))?	<u>X</u>	_____	_____	<u>No. 2</u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a), (b) and the minimum number of copies required by Section 262.22.	_____	<u>X</u>	_____	<u>No. 3</u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<u>X</u>	_____	_____	_____
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<u>X</u>	_____	_____	_____
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b).	_____	_____	<u>X</u>	_____
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<u>X</u>	_____	_____	_____

	<u>Yes</u>	<u>I</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked accordance with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a)).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
6. The generator meets the following record-keeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Section 262.41(a).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Section 262.41(b) and in compliance with Section 265.71, when applicable.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
a) <u>Containers</u> : the waste is stored in <u>closed containers</u> which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.	_____	_____	<u>X</u>	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174).	_____	_____	<u>X</u>	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line, and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	_____	_____	<u>X</u>	_____
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Section 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192 (d).	_____	_____	<u>X</u>	_____
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).	_____	_____	<u>X</u>	_____
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).	_____	_____	<u>X</u>	_____
h) Weekly inspections are made of all tank construction materials and containment structures (265.194).	_____	_____	<u>X</u>	_____
9. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b) (c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Sec. 262.34)	_____	_____	<u>X</u>	_____
10. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. (Sec. 262.34)	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197). (Sec. 262.34)	_____	_____	X	_____

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER "PART 3 - GENERAL INTERIM STATUS REQUIREMENTS (SECTION 265)."

REMARKS, PART 2. GENERATOR REQUIREMENTS

No. 2 The K062 (spent pickle liquor) waste material is neutralized in a totally enclosed treatment system as defined in Sect-on 260.10(a)(70). The treated effluent is disposed of via the Columbus City Sewer System. This waste material and waste treatment equipment is exempted from RCRA regulation under Section 265.1(c)(9).

Columbus Products also has equipment for redistilling methylene chloride on site. This treatment equipment is connected by pipe to an industrial production process and is located indoors. When used in this mode, the redistillation equipment could be considered to be totally enclosed and therefore exempt from regulation as defined in Section 265.1. The redistillation equipment can also be used in a manual mode, with storage of the waste methylene chloride prior to treatment; when used in this manner the process may require a RCRA treatment permit and may be subject to the regulatory requirements of Section 265 during the interim status period. The methylene chloride redistillation equipment was not in use at the time of the inspection.

No. 3 Only one shipment of regulated hazardous waste has been shipped off-site since November 19, 1980 which was a load of drummed methylene chloride and 1,1,1-trichloroethane solvents sent to a reclaimer. Because of confusion of the part of the shipper and the receiver in regard to the regulatory status of these solvents under Section 261.6, a shipping paper provided by Solvent Resource Recovery was used in place of a hazardous waste manifest. The shipping paper contained most of the information required to be on a hazardous waste manifest by Section 262.21(a), but lacked the U.S. EPA identification number of the generator and the transporter. Because these solvents are listed under Hazardous Waste Category No. F002, their storage or transportation prior to reclamation is fully regulated as per Section 261.6(b).

PART 3. GENERAL INTERIM STATUS REQUIREMENTS (Section 265)

SUBPARTS INCLUDED

1. Subpart B: General Facility Standards
2. Subpart C: Preparedness and Prevention
3. Subpart D: Contingency and Emergency
4. Subpart G: Closure for Non-Disposal Facilities

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility meets all requirements under General Facility Standards in Section 265, Subpart B:				
a) The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sec. 265.13(a)(1).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 4</u>
c) If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Section 265.14).				
1. 24 hour surveillance system.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Artificial or natural barrier completely surrounding the active portion of the facility.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii)).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c)).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 5</u>

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
d) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15)	<u> </u>	<u> </u>	<u>X</u>	<u>No. 2</u>
1. Inspect emergency equipment.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
2. Inspect monitoring equipment.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
3. Inspect security, alarm and communications devices.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
4. Inspect process equipment (pipes, pumps, etc.).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
5. Inspect containment structures (dikes, curbs, etc.).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
6. Inspect facility for structural malfunctions (roof, floor, etc.).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
7. Inspect hazardous waste handling/loading areas each day used.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
8. Record of any malfunctions due to equipment or operator errors.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
9. Record of any hazardous waste discharges.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
e) The facility has provided a Personnel Training Program in compliance with Section 265.16 (a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 6</u>
f) The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 6</u>

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
g) If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17):		<u>X</u>		<u>No. 7</u>
1. Protection from sources of ignition.	<u>X</u>			
2. Physical separation of incompatible waste materials.		<u>X</u>		<u>No. 7</u>
3. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.		<u>X</u>		<u>No. 8</u>
4. Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).			<u>X</u>	

REMARKS, SEC. 265, SUBPART B

No. 4 A written waste analysis plan for the F002 solvents was not available. The methylene chloride and 1,1,1,-trichloroethane generated at the facility come from well-known processes that are not likely to change significantly.

Columbus Products frequently tests the waste K062 pickle liquor in order to properly treat it; this is done on a routine basis and not as a result of a written RCRA waste analysis plan.

No. 5 The Columbus Products Facility is very large and has many controlled-access entry gates, not all of which are equipped with "Danger, Authorized Personnel Only" signs. Once inside the facility, the indoor hazardous waste storage area is accessible through numerous entryways. Posting the required signs at strategic locations on the three open sides of the waste storage area is recommended.

No. 6 No special arrangements have been made to incorporate the training requirements of the RCRA regulations into the existing Employee Training Program, which is geared toward OSHA requirements. Employees are presently trained to properly handle hazardous raw materials, rather than as waste materials.

No. 7 The waste storage area and raw material storage area are located in the same general area of the facility. Both waste materials and raw materials are stored in closed containers on wooden pallets, but the various types of materials are not physically separated by appreciable distance or barriers. Physical separation of waste materials and raw materials, which could create a hazard if leaks should occur simultaneously, is recommended.

No. 8 "No Smoking/No Open Flames" signs are recommended for the waste/raw material storage areas used to store ignitable materials.

PART 3. GENERAL INTERIM STATUS REQUIREMENTS

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The facility meets all requirements for Preparedness and Prevention in Section 265, Subpart C:				
a) Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	<u> </u>	<u> X </u>	<u> </u>	<u>No. 9</u>
b) If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
1. Internal alarm system.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
2. Access to telephone, radio or other device for summoning emergency assistance.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
3. Portable fire control equipment.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
4. Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
c) All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented.	<u> X </u>	<u> </u>	<u> </u>	<u>No. 10</u>
d) If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Section 265.34)	<u> X </u>	<u> </u>	<u> </u>	<u>No. 11</u>
e) If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement of emergency or spill control equipment is maintained (265.35).	<u> X </u>	<u> </u>	<u> </u>	<u> </u>

	<u>Yes</u>	<u>N</u>	<u>N/A</u>	<u>Remark #</u>
f) If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a)).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 12</u>
g) Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b)).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart D: Contingency and Emergency

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The facility meets all requirements for <u>Contingency Plan and Emergency Procedures</u> in Section 265, Subpart D.				
a) The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:	<u>X</u>	<u> </u>	<u> </u>	<u>No. 13</u>
1. Actions to be taken by personnel in the event of an emergency incident.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Arrangements or agreements with local or state emergency authorities.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 14</u>
4. A list of all emergency equipment including location, physical description and outline of capabilities.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
5. If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Section 265.51(f)).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 15</u>

	<u>Yes</u>	<u>N</u>	<u>N/A</u>	<u>Remark #</u>
b) A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (Section 265.53)	<u>X</u>	<u> </u>	<u> </u>	<u>No. 16</u>
c) The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 16</u>
d) An emergency coordinator is designated at all times (on-site or on-call), is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Section 265.55).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 14</u>
e) If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Section 265.56.	<u> </u>	<u> </u>	<u>X</u>	<u>No. 17</u>

REMARKS, SEC. 265, SUBPARTS C AND D

- No. 9 The plant was once evacuated due to a toluenediisocyanate leak.
- No. 10 Alarm system tested monthly, fire and communications equipment tested weekly.
- No. 11 Foremen are equipped with radio communication.
- No. 12 A nurse is available on site during the first shift. Plant security personnel have first aid training. The fire department has been familiarized with plant hazards and layout.
- No. 13 The existing plant SPCC plan and general safety plan covers the hazards associated with the raw materials used at the plant, which are very similar to the hazards associated with the waste materials.
- No. 14 The existing plan contain various names of personnel to be contacted in the event of an emergency, but not all of them would qualify as the designated Emergency Coordinator required by Section 265.51 of the RCRA regulations.
- No. 15 The plant has a general evacuation plan which does not address the specific hazards presented by the storage of regulated hazardous wastes.
- No. 16 A separate contingency plan or an amendment to the existing plan written around the specific hazards presented by the storage of listed (F002) hazardous wastes would better satisfy the requirements of Section 265, Subpart D.
- No. 17 The existing plan worked satisfactorily during the toluenediisocyanate leak incident.

PART 3. GENERAL INTERIM STATUS REQUIREMENTS (Section 265)

Partial Subpart G: Closure For Non-Disposal Facilities (Section 265.110(a))

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The facility meets all applicable closure requirements under Section 265, Subpart G for Non-Disposal Facilities:	_____	_____	<u>X</u>	<u>No. 18</u>
a) A written closure plan is on file at the facility and contains the following elements: (Section 265.112)				
1. A description of how and when the facility will be closed (265.112(a)(1)).	_____	_____	<u>X</u>	_____
2. A description of how any of the applicable closure requirements in other subparts of Section 265 (Tanks-265.197, Surface Impoundments-265.228) will be implemented.	_____	_____	<u>X</u>	_____
3. An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	_____	_____	<u>X</u>	_____
4. A description of steps taken to decontaminate facility equipment.	_____	_____	<u>X</u>	_____
5. A list of dates over which the various phases of closure are expected to be completed.	_____	_____	<u>X</u>	_____
b) The closure plan has been amended, if necessary, in response to changes in facility design or processes.	_____	_____	<u>X</u>	_____
c) The closure plan has been submitted to the regional administrator 180 days prior to beginning the closure process.	_____	_____	<u>X</u>	_____
d) The facility has been closed within the time limits specified by Section 265.113.	_____	_____	<u>X</u>	_____
e) Upon completion of closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114).	_____	_____	<u>X</u>	_____

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
f) Completion of closure has been certified to the regional administrator by the owner/operator and an independent Professional Engineer (265.115).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
g) The facility has been closed in a manner which minimizes any future problems (265.111).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

REMARKS, PART 3. SUBPART G, CLOSURE

No. 18 A closure plan is not required until May 19, 1981.

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

SUBPARTS INCLUDED

1. Subpart I: Management of Containers
2. Subpart J: Management of Tanks
3. Subpart K: Surface Impoundments
4. Subpart L: Waste Piles

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility meets all requirements for Management of Containers in Section 265, Subpart I:	<u> </u>	<u> X </u>	<u> </u>	<u> </u>
a) Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Section 265.171, .172, .173).	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
b) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174).	<u> X </u>	<u> </u>	<u> </u>	<u> No. 19 </u>
<u>NOTE:</u> FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTION 262).				
c) Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
d) Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Section 265.17(b). (Section 265.177(a) (b)).	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
e) Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Section 265.177(c)).	<u> </u>	<u> X </u>	<u> </u>	<u> No. 7 </u>

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart J: Storage in Tanks

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The facility meets all requirements for storage in tanks in Section 265 Subpart J:	_____	_____	<u>X</u>	_____
a) The tank(s) are operated in compliance with the safety requirements of Section 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d).	_____	_____	<u>X</u>	_____
b) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).	_____	_____	<u>X</u>	_____
c) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).	_____	_____	<u>X</u>	_____
d) Weekly inspections are made of all tank construction materials and containment structures (265.194).	_____	_____	<u>X</u>	_____
e) Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Section 265.193(a)).	_____	_____	<u>X</u>	_____
1. A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	_____	_____	<u>X</u>	_____
2. Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

No. 19 Inspections of container storage area for leaks and corrosion are not documented.

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
f) With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Section 265.198 (a)):	_____	_____	<u>X</u>	_____
1. The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17 (b).	_____	_____	<u>X</u>	_____
2. The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	_____	_____	<u>X</u>	_____
g) Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Section 265.198(b)).	_____	_____	<u>X</u>	_____
h) Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Section 265.199).	_____	_____	<u>X</u>	_____
j) Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197).	_____	_____	<u>X</u>	_____

REMARKS, PART 4 SUBPART J- TANKS

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart K: Surface Impoundments

	Yes	No	N/A	Remark #
3. The facility meets all requirements for management of wastes in Surface Impoundments in Section 265, Subpart K:	___	___	X	___
a) The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Section 265.222).	___	___	X	___
b) Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22).	___	___	X	___
c) The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented (Section 265.226).	___	___	X	___
d) Has the facility ever recorded an unplanned release of hazardous waste from the Surface Impoundment(s)? (Section 265.15)	___	___	X	___
e) Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes by one or both of the following methods (265.225):	___	___	X	___
1. A complete waste analysis plus bench scale or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	___	___	X	___
2. Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	___	___	X	___

Yes	No	N/A	Remark #
-----	----	-----	----------

f) With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Section 265.229):

_____	_____	X	_____
-------	-------	---	-------

1. The waste is treated immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).

_____	_____	X	_____
-------	-------	---	-------

g) Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (Section 265.230).

_____	_____	X	_____
-------	-------	---	-------

h) As required by Subpart F, Section 265.90, (Ground Water Monitoring) the facility has implemented a ground water monitoring program capable of determining the impact of the Surface Impoundment(s) on the quality of the ground water in the uppermost aquifer underlying the facility.

_____	_____	X	_____
-------	-------	---	-------

j) In lieu of a ground water monitoring program, the operator has a written demonstration that there is a low potential for migration of hazardous waste or constituents via ground or surface waters which has been certified in writing by a qualified geologist in compliance with Section 265.90(c).

_____	_____	X	_____
-------	-------	---	-------

k) Upon closure of the Surface Impoundment, the operator intends to remove all wastes, residues, liners and any contaminated soil as required by Section 265.228 in order to exempt the Surface Impoundment from further regulation under Section 265.

_____	_____	X	_____
-------	-------	---	-------

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS. (SECTION 265.228(e)).

Subpart L: Storage in Waste Piles

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The facility meets all requirements for storage in Waste Piles in Section 265, Subpart L:	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
a) Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal (Section 265.251).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b) If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Section 265.253).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
1. The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
2. The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
3. No liquids or wastes containing free liquids are placed in the pile.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
c) No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Section 265.252).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
d) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met (Section 265.256):	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive and was done in compliance with the safety requirements of Section 265.17(b).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
2. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
e) Incompatible materials are never placed in the same Waste Pile or near areas containing residues of a incompatible material unless it is done in compliance with the safety requirements of Section 265.17(b) (Section 265.257(a)(c).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
f) Piles of hazardous waste are never stored near other materials which may interact with the waste in a hazardous manner (Section 265.257(b).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

REMARKS, PART 4 - SUBPART L, WASTE PILES

INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

Form Approved
EPA ID. NUMBER

F OH D 00

I. EPA I.D. NUMBER

II. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

OHD 095030979

Columbus Products Company
300 Phillipi Road
Columbus, Ohio 43228

300 Phillipi Road

If a preprinted label is used, it in the designated area. Fill it through it and enter the appropriate fill-in data in the preprinted data area. The left of the label space (the area that should appear) must be proper fill-in area(s). Items I, III, V, and VI must be completed regardless of whether items if no label has been used. the instructions for definitions and for the legal which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any of the questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the instructions if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your facility is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X

III. NAME OF FACILITY

1 SKIP **COLUMBUS PRODUCTS COMPANY**

IV. FACILITY CONTACT

HUNTING TOWN (Name, title, and title)
2 **RICHARD L. HUNTINGTON** SR MFG ENG **614 272 4000**
B. PHONE (area code & no.)

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX
3 **300 PHILLIPI RD**
B. CITY OR TOWN **C. STATE** **D. ZIP CODE**
4 **COLUMBUS OHIO** **OH** **43228**

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER
5 **300 PHILLIPI RD**
B. COUNTY NAME
FRANKLIN
C. CITY OR TOWN **D. STATE** **E. ZIP CODE** **F. COUNTY CODE (if known)**
6 **COLUMBUS** **OH** **43228** **049**

NOV 19 1980

A. FIRST										(specify)									
7 3 6 3 2										7									
C. THIRD										D. FOURTH									
(specify)										(specify)									

VIII. OPERATOR INFORMATION																													
A. NAME																													
COLUMBUS PRODUCTS COMPANY																												B. Is the name listed in Item VIII-A also the owner?	
																												<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																													
F = FEDERAL S = STATE P = PRIVATE															M = PUBLIC (other than federal or state) O = OTHER (specify)														
															P (specify)														
D. PHONE (area code & no.)																													
A 614 272 4000																													
E. STREET OR P.O. BOX																													
300 PHILLIPI ROAD																													
F. CITY OR TOWN																													
COLUMBUS																				G. STATE					H. ZIP CODE				
COLUMBUS																				OH					43228				
IX. INDIAN LAND																													
Is the facility located on Indian lands?																													
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																													

X. EXISTING ENVIRONMENTAL PERMITS																													
A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)														
9 N 0 H 0 0 0 0 4 5 9 6															9 P N A														
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)														
9 U N A															9 N A														
C. RCRA (Hazardous Wastes)															E. OTHER (specify)														
9 R T O B E I S S U E D															9 N A														

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)																													
<p style="text-align: center;">MANUFACTURER OF REFRIGERATORS AND DISHWASHERS</p> <p style="text-align: right;">F9: A 51</p>																													

XIII. CERTIFICATION (see instructions)																													
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.																													
A. NAME & OFFICIAL TITLE (type or print)															B. SIGNATURE										C. DATE SIGNED				
F. DIEKMANN, PRESIDENT															G. F. Diekmann										11/7/88				
COMMENTS FOR OFFICIAL USE ONLY																													

FOR OFFICIAL USE ONLY

APPROVED	DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<u>Storage:</u>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
<u>Disposal:</u>		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

Treatment:

TANK

SURFACE IMPOUNDMENT

INCINERATOR

OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)

PRO-
CESS
CODE

APPROPRIATE UNITS OF
MEASURE FOR PROCESS
DESIGN CAPACITY

T01

GALLONS PER DAY OR
LITERS PER DAY
GALLONS PER DAY OR
LITERS PER DAY
TONS PER HOUR OR
METRIC TONS PER HOUR;
GALLONS PER HOUR OR
LITERS PER HOUR

T04

GALLONS PER DAY OR
LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U

UNIT OF MEASURE

UNIT OF MEASURE	UNIT OF MEASURE CODE
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H

UNIT OF MEASURE

UNIT OF MEASURE	UNIT OF MEASURE CODE
ACRE-Feet	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C										T/A C										3 1									
1 2 3 4 5 6 7 8 9 10										11 12 13 14 15 16 17 18 19 20										21 22 23 24 25 26 27 28 29 30									
X-1 S 0 2										600										G									
X-2 T 0 3										20										E									
1 S 0 1										8910000										G									
2 S 0 4										15660000										G									
3																													
4																													
5 T 0 1										3250000 twice each m.										U									
6 T 0 3										0.025										D									
7																													
8																													
9																													
10																													

PAINT SLUDGE IS AIR DRIED IN OUTSIDE PITS TO ALLOW IT TO HARDEN AND TO INCREASE SOLIDS CONTENT FOR LANDFILL DISPOSAL.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

...ITS TO ALLOW IT TO HARDEN AND TO INCREASE SOLIDS

INCLUDE SPACE FOR ADDITIONAL PROCESS CODE OR FOR DESIGN CAPACITY.

NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY										Form Approved OMB No. 1585-0004									
W 0 H D 0 9 5 0 3 0 9 6 8 3 1															W DUP										T/A C 3 2 DUP									
13 14 15															1 2										13 14 15 23 24 25 26									

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
	1. PROCESS CODES (enter)												2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
1	F	0	0	1	660000	G	S	0	1							1,1,1 TRICHLOROETHANE WASTE SOLVENT RECLAIMED & RETURNED		
2	F	0	0	2	80000000	G	S	0	1							METHYLENE SOLVENT WASTE SOLVENT-RECLAIMED & RETURNED		
3	U	2	2	3	250000	G	S	0	1							T.D.I. - TO BE RECYCLED		
4	U	2	3	9	660000	G	S	0	4							PAINT SOLVENT - TO BE RECYCLED		
5	F	0	1	7	150000000	G	S	0	4							PAINT SLUDGE-AIR DRIED- ON SITE LAND FILLED - OFF SITE		
6	D	0	0	2	780000000	G	T	0	1							WASTE PICKLE LIQUOR NEUTRALIZED SOLUTION		
7	S	0	1	7	10000000	P	T	0	3							PAINT BURN OFF OVEN		
8																		
9																		
10																		
11																		
12																		
13																		
14																		
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26																		

EPA Form 3510-3 (6-80)

EPA I.D. NO. (enter from page 1)														
F	O	H	D	0	9	5	0	8	0	9	3	9	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: 7/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

A
F6: 56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

3	9	2	5	7	3	0	0
65	60	67	68	69	70	71	

LONGITUDE (degrees, minutes, & seconds)

8	3	0	0	6	3	0	0
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E WHITE CONSOLIDATED INDUSTRIES

216-252-3700

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F 11770 BEREA ROAD

G CLEVELAND

OH

44111

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

P. F. SALIPANTE

B. SIGNATURE

P. F. Salipante

C. DATE SIGNED

11/17/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

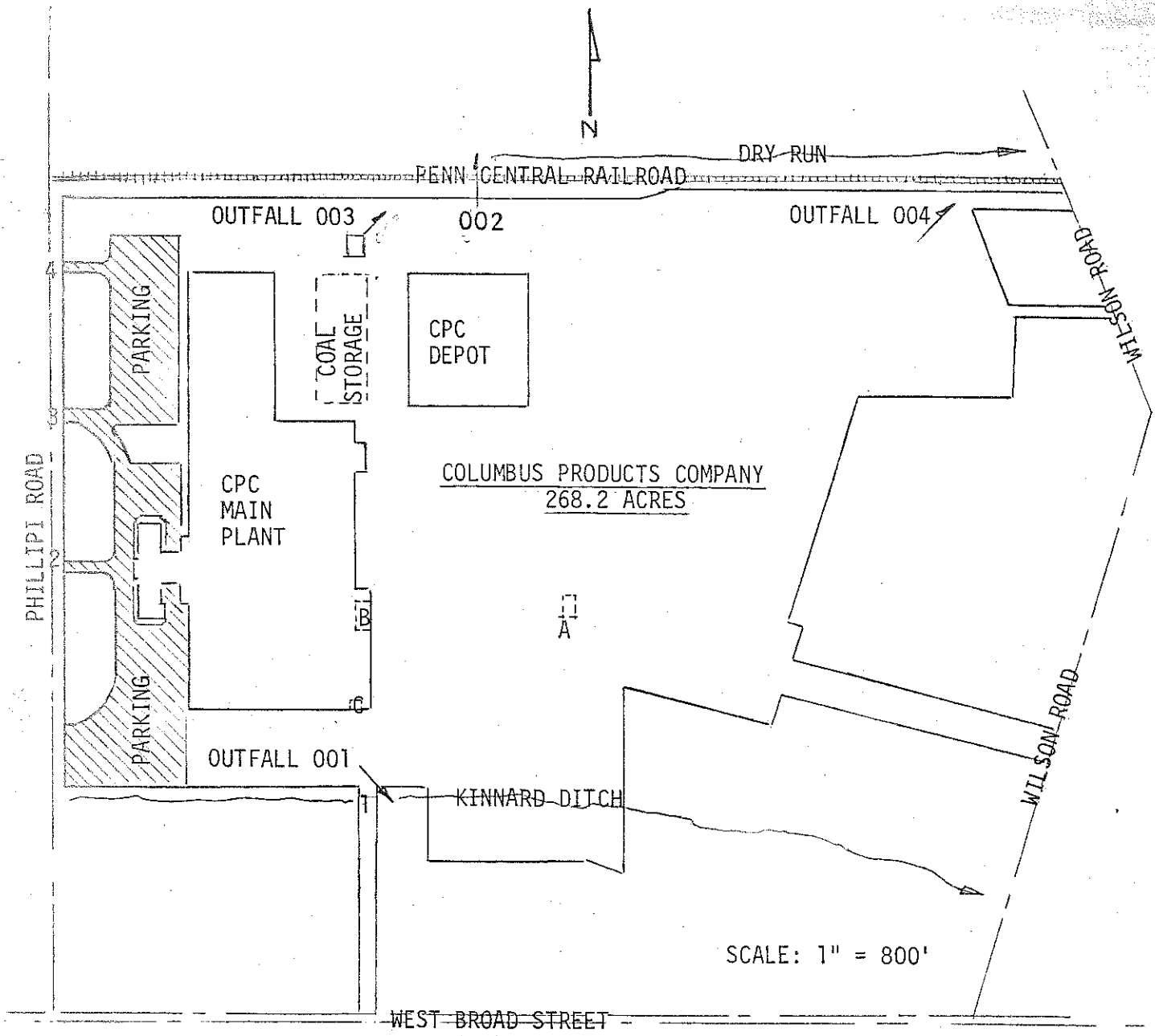
G. F. DIEKMANN

B. SIGNATURE

G. F. Diekmann

C. DATE SIGNED

11/7/80



- A - PAINT SLUDGE DRYING PIT 24' X 24'
- B - SALVAGE AREA, DRUM HANDLING AND STORAGE 80' X 240'
- C - LIME NEUTRALIZATION AREA, ACID WASTE TO SANITARY SEWER 20' X 40'
- 1,2,3 & 4 - GATE NUMBERS



D. Corrective
Action



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
WMD RCRA
RECORD CENTER

MAY 06 1993

Comp

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Albert Bell
Senior Vice President
Consolidated Stores, Inc.
300 Phillipi Road
Columbus, Ohio 43228

Re: Visual Site Inspection
Consolidated Stores, Inc.
(Formerly Columbus Products, Inc.)
Columbus, Ohio
OHD 095 030 979

Dear Mr. Bell:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**CONSOLIDATED STORES, INC.
(FORMERLY COLUMBUS PRODUCTS, INC.)
COLUMBUS, OHIO
OHD 095 030 979**

RELEASED
DATE 11/01/01
RIN #
INITIALS Sh

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 095 030 979
Date Prepared	:	March 5, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH4F
Prepared by	:	PRC Environmental Management, Inc. (Pete Zelinkas)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

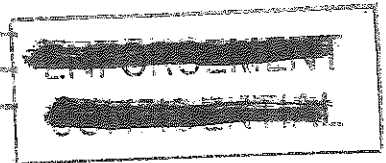
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RELEASED
DATE 11-01-01
RIN #
INITIALS *Ch*



EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Consolidated Stores, Inc. (Consolidated), facility in Columbus, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The facility covers about 268 acres in an industrial area of western Columbus. Consolidated purchased the facility from Columbus Products, Inc. (Columbus Products) in 1989 and uses it as a retail distribution center. Consolidated generates no hazardous waste. From 1954 to 1989, the facility was used to manufacture refrigerators and dishwashers. In 1980, Columbus Products filed a Part A permit application as a treatment, storage, or disposal (TSD) facility. Storage units identified were the Former Hazardous Waste Storage Area (SWMU 2) (S01 - container storage) and the Former Paint Sludge Drying Area (SWMU 3) (S04 - surface impoundment). The permit application listed the following waste codes: F001, F002, U223, U239, and D002. Columbus Products RCRA closed SWMU 2 in 1983; however, SWMU 3 did not go through closure.

The nearest residential area is about 0.75 mile northeast of the facility. The nearest school is about 1 mile east. There are no sensitive environments near the facility. It is completely surrounded by a chain-link fence, excluding the west side of the main building. Consolidated has security personnel on site 24 hours per day, 7 days per week.

The PA/VSI identified the following five SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Former Satellite Accumulation Areas
2. Former Hazardous Waste Storage Area
3. Former Paint Sludge Drying Area
4. Former Wastewater Pretreatment Area
5. Waste Oil Storage Area

Area of Concern

1. Former Liquid Materials Storage Area

[REDACTED]
[REDACTED]

The potential for this facility to release hazardous constituents to on-site soils and ground water is moderate. The Former Paint Sludge Drying Area (SWMU 3) could not be located during the VSI, and PRC believes the unit may have been buried. The possibility that a release to on-site soils and ground water from the Former Liquid Materials Storage Area (AOC 1) has occurred is low to moderate. The area was used by Columbus Products as a main storage and traffic area for chemicals moving in and out of the facility. An underground storage tank (UST) used by Columbus Products is in this area; however, its use and its capacity are unknown. The Waste Oils Storage Area (SWMU 5) is within AOC 1 and provides no secondary containment for drums stored there. The water table in the area occurs about 10 feet below ground surface. However, because the geology beneath the facility mostly consists of thickly bedded clays, ground water is of poor quality and is not used as a local drinking water source. No drinking water wells are located within 3 miles of the facility.

The potential for all SWMUs at the facility to release hazardous constituents to surface water is low. Columbus Products had a National Pollutant Discharge Elimination System (NPDES) permit for releases to drainage pathways at the north and south ends of the facility. The two pathways merge and eventually empty into the Scioto River about 2.75 miles from the facility. The Scioto River is the primary drinking water source for western Columbus. Consolidated does not have an NPDES permit. Discharges to surface water from the facility consist only of storm water.

The potential for the facility to release hazardous constituents to air is low. Columbus Products had 16 air permits covering paint ventilation systems. Consolidated has no sources that could release hazardous constituents to air and has no air permits.

Because the Former Paint Sludge Drying Area (SWMU 3) could not be located during the VSI, was never properly closed, and could be buried, PRC recommends that a geophysical survey be performed in the SWMU's supposed location. Once the probable location of the unit is determined, the unit should be RCRA closed. Soil borings with continuous split-spoon sampling should be performed throughout the area to ground water. Soil samples should be analyzed for hazardous constituents. A number of the borings should be converted to ground-water monitoring wells, which should then be sampled and analyzed for hazardous constituents.

PRC also recommends that, because of its use over the years, and because of observations made during the VSI, soil and ground-water samples be taken in the Former Liquid Materials Storage Area (AOC 1) and analyzed for hazardous constituents. Sludge should be sampled from the UST in AOC 1 and analyzed for hazardous constituents. In addition, secondary containment should be provided at the Waste Oil Storage Area (SWMU 5).

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Consolidated Stores, Inc. (Consolidated) [formerly Columbus Products, Inc. (Columbus Products)], facility in Columbus, Ohio. The PA was completed on November 2, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on November 3, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified five SWMUs and one AOC at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and four inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

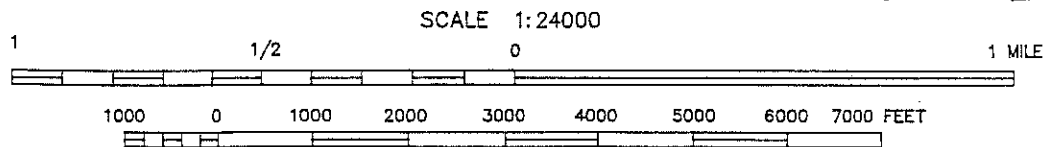
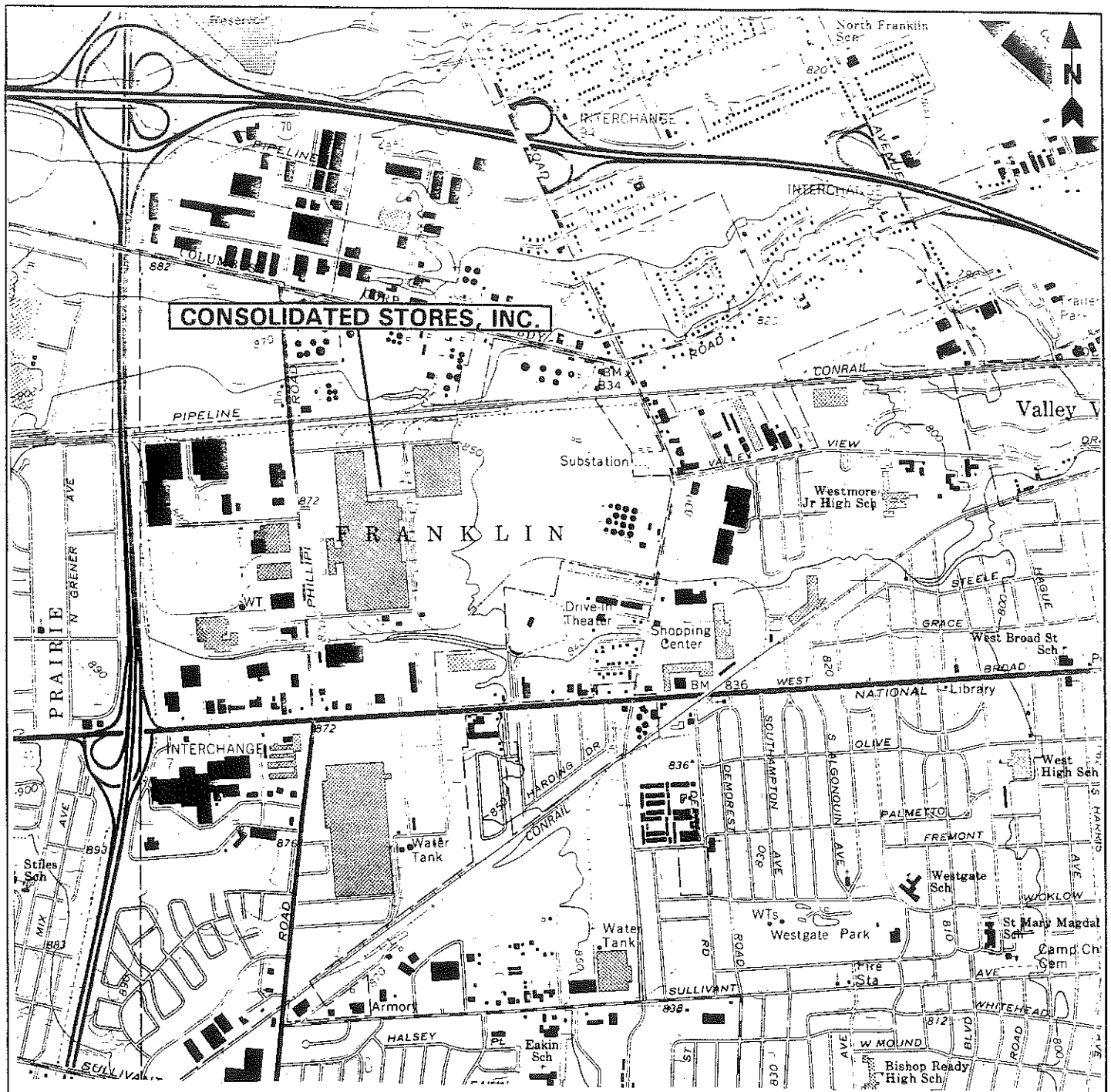
2.1 FACILITY LOCATION

The Consolidated facility is located at 300 Phillipi Road in Columbus, Franklin County, Ohio (latitude 39°57'30" north, longitude 83°06'30" west), as shown in Figure 1. The Consolidated facility is located in a mixed industrial and small business area of western Franklin County. It is bordered to the north by Conrail railroad tracks; to the east by open land and a British Petroleum, Inc., oil refinery; to the south by a series of retail stores and two automobile dealerships; and to the west by a number of small businesses.

2.2 FACILITY OPERATIONS

The Consolidated facility covers about 268 acres; about 2 million square feet of this is indoors. The facility consists of two separate buildings on the western half of the property. The main building, which includes storage areas, a receiving dock, and offices, covers about 35 acres. The second building, used for receiving and shipping, covers about 10 acres. Asphalt drives and truck trailer parking areas surround the buildings. The remaining acreage is undeveloped and highly overgrown with vegetation.

The facility opened in 1954 by Westinghouse, Inc. (Westinghouse), and was used to manufacture refrigerators and dishwashers. Manufacturing operations included metal forming, assembly, painting, and limited electroplating. The main building on the property was used for manufacturing, while the smaller building was used as a parts distribution warehouse. In 1975, Westinghouse sold its major appliance business, and the facility was purchased by White Consolidated Industries, Inc. (White). White operated the facility under the name Columbus Products, Inc (Columbus Products). At one time, the facility employed about 3,500 people; as recently as 1980, there were about 2,200 employees. In 1982, refrigerator production at the facility ceased, and scaling down of operations began. In 1986, the parts distribution building was sold to Consolidated. Operations at the facility ended in 1988, and all manufacturing equipment was removed from the main building. Consolidated purchased the main building in 1989. PRC was unable to locate, and Consolidated was unable to supply, the names of any former employees of Columbus Products.



SCALE: 1" = 2,000'



SOURCE: Modified from USGS, 1982.

CONSOLIDATED STORES, INC.
COLUMBUS, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

Currently, Consolidated operates as a retail distribution company. Retail products, usually consisting of off-brand items, wholesale products from company buyouts and bulk manufacturer sales, are acquired by Consolidated and stored at the facility. The products are then distributed to Consolidated's retail outlets, including Big Lots and Odd Lots. Consolidated uses the facility entirely for receiving, warehousing, and shipping of the retail products, which include general household goods, clothing, automobile parts, and sporting goods. Consolidated may add another building at the facility to supply more warehousing space.

2.3 WASTE GENERATION AND MANAGEMENT

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and the AOC, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

No manufacturing currently occurs at the facility. Consolidated is a retail distribution company and uses the facility for receiving, storage, and shipping of retail goods. No hazardous waste is generated at the facility. Nonhazardous waste oils are generated from the maintenance of forklift trucks used throughout the facility. The waste oils are placed in 55-gallon drums and stored in the Waste Oil Storage Area (SWMU 5). Consolidated generates about 20 drums of waste oil per year. The waste oil is taken to Clark Oil, Inc., in Columbus for reclamation.

Under Columbus Products, hazardous wastes generated included waste paint materials (F003 and D001); waste paint sludge (D001); waste methylene chloride (F002); waste 1,1,1-trichloroethane (F001); waste acid solution (D002); and wastewater pretreatment sludge (F006). Nonhazardous wastes included wastewater and waste oils and hydraulic fluids.

Waste paint materials (F003 and D001), including solvents and sludges, were generated from painting refrigerators and dishwashers. The materials were mainly generated from cleaning paint application equipment and from expired or unusable product. The waste materials were placed in 55-gallon drums in Former Satellite Accumulation Areas (SAA) (SWMU 1). When full, the drums were transferred to the Former Hazardous Waste Storage Area (SWMU 2). Waste paint materials, mainly composed of solvents, were pumped directly from the 55-gallon drums at SWMU 2 to a bulk tanker truck. These materials were taken to Systech Liquid Treatment General Portland, Inc. (Systech), in Paulding, Ohio, for fuels blending. Columbus Products hazardous waste shipment manifests indicate that about 120 drums of waste paint materials were shipped from the facility annually.

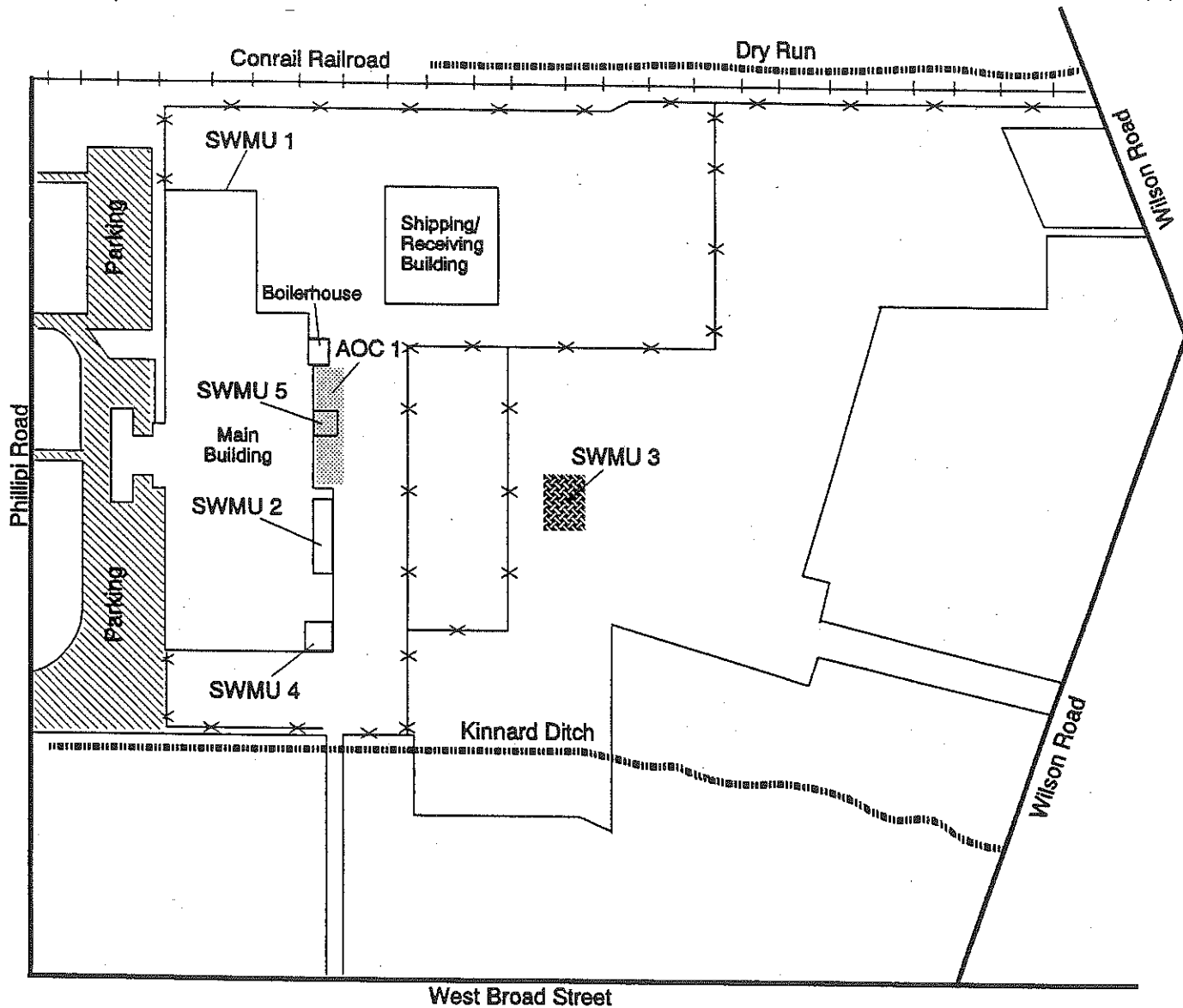
According to a Part A permit application filed in 1980 by Columbus Products, a Former Paint Sludge Drying Area (SWMU 3) was present at the eastern portion of the facility (Columbus Products, 1980b). The unit was used to dewater drummed paint sludge (D001) from SWMU 2 to

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Former SAAs	No	Inactive
2	Former Hazardous Waste Storage Area	Yes	RCRA-closed in 1983
3	Former Paint Sludge Drying Area	Yes	Inactive, did not undergo RCRA closure
4	Former Wastewater Pretreatment Area	No	Inactive, removed in 1988
5	Waste Oil Storage Area	No	Active

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Solid Waste Management Units

- SWMU 1 Former Satellite Accumulation Areas (throughout main building)
- SWMU 2 Former Hazardous Waste Storage Area
- SWMU 3 Former Paint Sludge Drying Area (suspected)
- SWMU 4 Former Wastewater Pretreatment Area
- SWMU 5 Waste Oil Storage Area

Areas of Concern

- AOC 1 Former Liquid Materials Storage Area

LEGEND

- XXXXX Fence
- ||||| Ditch
- +++++ Railroad

Source: Modified from Columbus Products, 1980b.

SCALE: 1" = 800'

CONSOLIDATED STORES, INC.
COLUMBUS, OHIO

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
<u>Under Consolidated</u>		
Waste Oils/NA	Forklift truck maintenance	5
<u>Under Columbus Products</u>		
Waste paint materials/F003 and D001	Painting operations and maintenance	1 and 2
Waste paint sludge/D001	Painting operations	1, 2, and 3
Waste methylene chloride/F002	Coating and painting line flushing	1 and 2
Waste 1,1,1-trichloroethane/F001	Degreasing operations	1 and 2
Waste acid solution/D002	Electroplating operations	1 and 4
Wastewater pretreatment sludge/F006	Wastewater pretreatment	1, 2, and 4
Wastewater/NA	Electroplating operations	4
Waste oils and hydraulic fluids/NA	Maintenance of facility machinery	1 and 2

Notes:

^a Not applicable (NA) designates nonhazardous waste.

make the materials acceptable for landfill disposal. No manifests are available indicating landfill disposal of sludge, and PRC could not determine how long the unit was used. Consolidated officials had no knowledge of the unit. PRC could not locate the unit during the VSI.

Columbus Products generated waste methylene chloride (F002) from flushing coating and painting lines. The waste materials were placed in 55-gallon drums at the Former SAAs (SWMU 1) and eventually moved to SWMU 2. The materials were pumped from the drums to a bulk tanker truck and taken to Solvent Resource Recovery, Inc. (SRR), in West Carrollton, Ohio for reclamation. Columbus Products generated about 20 drums of waste methylene chloride per year.

From degreasing operations, Columbus Products generated waste 1,1,1-trichloroethane (F001). The waste solvent was placed in 55-gallon drums at the Former SAAs (SWMU 1) and eventually transferred to SWMU 2. Columbus Products generated about two drums per year of waste 1,1,1-trichloroethane. The drums were taken to SRR for reclamation. During the VSI, PRC could not determine former locations of degreasing operations.

Until 1985, Columbus Products generated waste acid solution (D002) and rinsewaters from an electroplating process. The solution was pumped into 55-gallon drums at the Former SAAs (SWMU 1), transferred to the Former Wastewater Pretreatment Area (SWMU 4), and slowly added to the pretreatment system. Rinsewaters from the electroplating process flowed continuously. Wastewater was treated by neutralizing it with a lime and caustic mixture. The neutralized solution was then released to the City of Columbus sanitary sewer.

To improve wastewater treatment, the Former Wastewater Pretreatment Area (SWMU 4) was upgraded in 1984 and 1985. Columbus Products added additional tanks and feed lines for a metal hydroxide precipitation system. All wastewater, which flowed at a rate of about 180 gallons per minute (gpm) during normal operating periods, was neutralized. The system generated wastewater pretreatment sludge (F006) and wastewater. Sludge was placed in 55-gallon drums in the Former SAAs (SWMU 1) and eventually transferred to the Former Waste Storage Area (SWMU 2). Columbus Products generated about 11 55-gallon drums of sludge per month, which were taken to Fondessy Enterprises, Inc. (Fondessy), in Oregon, Ohio for treatment and disposal. Pretreated wastewater was discharged from SWMU 4 to a City of Columbus publicly owned treatment works (POTW).

Columbus Products also generated nonhazardous waste oils and hydraulic fluids. The materials were generated from maintenance performed on machinery and vehicles throughout the facility. The wastes were placed in the Former SAAs (SWMU 1) throughout the facility and transferred to SWMU 2. No documentation is available detailing disposal of the materials.

2.4

HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

Columbus Products held a National Pollutant Discharge Elimination System (NPDES) permit for discharges of storm water from the facility to four outfalls. In 1981, OEPA cited the facility six times for excess oil and grease in outgoing storm water (OEPA, 1981a and 1981c). No documentation is available detailing how the problems were addressed.

In late 1986, OEPA was alerted to oil-contaminated water leaving the facility via the NPDES outfalls. Columbus Products agreed that releases were occurring and were caused by water leaving a compressed air blowdown system. In January 1987, the water was rerouted to the sanitary sewer and the oil discharges ended (OEPA, 1987a).

2.5

REGULATORY HISTORY

Columbus Products submitted a Notification of Hazardous Waste Activity form to EPA in July 1980 (Columbus Products, 1980a). In November 1980, the facility filed a Part A permit application as a treatment, storage, or disposal (TSD) facility to operate under interim status. Storage units identified were the Former Hazardous Waste Storage Area (SWMU 2) (S01 - container storage) and the Former Paint Sludge Drying Area (SWMU 3) (S04 - surface impoundment). The permit application listed the following waste codes: F001, F002, U223, U239, and D002 (Columbus Products, 1980b).

In August 1982, Columbus Products informed OEPA that the facility would no longer store hazardous waste for over 90 days and would not require a TSD permit (Columbus Products, 1982). Columbus Products informed EPA of the permit withdrawal in June 1983. EPA immediately informed Columbus Products that a closure plan would be required for the facility before the permit application could be withdrawn. In August 1983, Columbus Products submitted to EPA a closure plan for the Former Hazardous Waste Storage Area (SWMU 2) (Columbus Products, 1983). The closure plan did not include the Former Paint Sludge Drying Area (SWMU 3).

Closure of SWMU 2 involved removing of all hazardous waste from the area. No documentation was available to indicate that rinsate sampling of the unit was performed. In September 1984, EPA granted Columbus Products a change in status to a RCRA generator of hazardous waste with less than 90-day storage (USEPA, 1984). OEPA approved the status change in April, 1985 (OEPA, 1985).

OEPA conducted compliance inspections at the facility in 1981, 1982, and 1984. Violations at the facility mainly involved improper labeling of waste containers, lack of complete labeling of waste containers, lack of complete waste analysis and contingency plans, and lack of proper training for employees handling hazardous waste (OEPA, 1981b, 1982b; 1984). Columbus Products satisfactorily corrected all deficiencies that led to the violations (OEPA, 1982a and 1983).

As mentioned in Section 2.2, Consolidated purchased the facility in 1986 and 1989. Currently, Consolidated generates no hazardous waste.

In late 1980, Columbus Products possessed 16 air permits covering paint vapor ventilation systems (Columbus Products, 1980b). No other record of air permits is documented. Consolidated has no air permits.

The facility was first issued an NPDES permit in May 1975 under Westinghouse (OEPA, 1975). The permit was for discharge of water to an outfall (001) to Kinnard Ditch, a drainage route bordering the south end of the facility. Westinghouse was required to monitor for the following parameters:

- Oil and grease
- Foaming agents
- Temperature
- Flow rate
- Hexavalent chromium
- Total chromium
- pH
- Biological oxygen demand (BOD)

In March 1980, the permit was renewed under Columbus Products for the outfall to Kinnard Ditch (001) and three additional outfalls, 002, 003, and 004 (OEPA, 1980). For outfall 001, monitoring requirements of the 1975 permit remained the same, excluding BOD and foaming agents. Outfall 002 was for nonprocess water exiting the facility to Dry Run, a drainage route on the northern border of the facility. Outfalls 003 and 004 were for stormwater runoff from a coal pile at the northern end of the facility. Outfall 003 discharged to Dry Run, while outfall 004 discharged to an undeveloped area east of the main building. Monitoring requirements for the three added outfalls were as follows:

- | <u>002</u> | <u>003</u> | <u>004</u> |
|------------------|--------------------|--------------|
| • Oil and grease | • Total iron | • Total iron |
| • pH | • Total arsenic | |
| • Flow rate | • Manganese | |
| | • Suspended solids | |
| | • pH | |
| | • Flow rate | |

As mentioned in Section 2.4, in 1981, Columbus Products was cited six times for excess oil and grease in outgoing storm water. The releases were to outfall 001, and no documentation is available detailing how the problems were addressed.

In December 1984, Columbus Products filed for a renewal of the NPDES permit, dropping outfall 004 from the application (Columbus Products, 1984). OEPA delayed processing the renewal because of the eliminated outfall. Soon after submitting of the application, Columbus Products eliminated the coal pile from the facility and informed OEPA that the application required further revision. OEPA agreed, and in October 1987, an NPDES permit was approved for outfalls 001 and 002 (OEPA, 1987b). Monitoring requirements for both outfalls were reduced to flow rate, oil and grease, and pH.

In late 1986, OEPA was alerted to oil-contaminated water leaving the facility via the NPDES outfalls. The problem was attributed to water leaving a compressed air blowdown system. In January 1987, the water was rerouted to the sanitary sewer, and the oil discharges ended.

During the sale of the facility in 1989, Columbus Products attempted to transfer the NPDES permit to Consolidated and filed all applicable paperwork. However, Consolidated elected not to accept the transfer because no manufacturing was occurring at the facility (OEPA, 1989a). The transfer was never completed, and in November 1989, OEPA revoked the facility's NPDES permit (OEPA, 1989b).

In April 1986, an underground storage tank (UST) was removed from the area south of the boilerhouse and east of the main building (Columbus Products, 1986). The capacity of the UST or materials of construction were not documented. The UST was part of an emergency dump system for a paint line in the facility. The UST was normally empty and was not used for storage. If contained paint from an emergency dump was reusable, it was returned to the paint line. Columbus Products did not know how long the UST had been used; however, it was not used after 1976.

Before excavation, the contents of the UST were removed by McKesson Envirosystems Company, of Newcastle, Kentucky, for treatment and disposal. Contents of the UST at the time of the removal were not documented. During the removal, solvent odors were noted near the excavated soils. Because of the vapors, in April 1986, OEPA elected to sample the soil from the area. Analysis revealed contamination different from materials that had been in the UST (OEPA, 1986a). Documentation detailing specific contaminants detected and amounts was not available. OEPA performed additional soil sampling in September 1986. Analyses for volatile organic compounds revealed no detectable contamination, and OEPA discontinued investigative action (OEPA, 1986b).

During the VSI, PRC noted a partially buried UST in the area south of the boiler house and east of the main building (AOC 1). Consolidated could supply no information concerning the UST. It consisted of a concrete shell below ground, with a steel covering above ground. PRC could not estimate the capacity of the UST because it was partially full of what appeared to be rainwater.

There is no documentation of CERCLA activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Franklin County is characterized by warm, humid summers and cold, cloudy winters. The yearly average temperature is 52 degrees Fahrenheit (°F). The lowest monthly average temperature is 30°F in January, and the highest monthly average temperature is 75°F in July. Precipitation in central Ohio is fairly well distributed throughout the year. The yearly average rainfall in Franklin County is 36.71 inches. Rainfall peaks in March at 4.17 inches; the lowest monthly rainfall is 2.23 inches in October. The prevailing wind is to the northeast and averages 9 miles per hour throughout the year. The 1-year, 24-hour maximum rainfall average is 2.3 inches, and annual net precipitation is 3.71 inches (USDA, 1980).

2.6.2 Flood Plain and Surface Water

The Consolidated facility does not lie in a flood plain or flood-prone area (FEMA, 1987). The nearest surface water bodies are Kinnard Ditch, which borders the southern edge of the property, and Dry Run, a drainage ditch bordering the northern end. Kinnard Ditch flows northeast to the Scioto River about 2.75 miles from Consolidated. Dry Run flows east and enters Kinnard Ditch about 2 miles from the facility. The Scioto River eventually empties into the Ohio River.

Kinnard Ditch and Dry Run are used mainly for storm water drainage for local industries and businesses. Storm water drainage from the Consolidated facility is to both. The Scioto River is used as the primary drinking water source for western Columbus. The nearest pumping station, the Dublin Road Water Plant, is about 3 miles northeast of the facility. The confluence of the Scioto River and Kinnard Ditch is about 4,000 feet upstream from the water plant.

2.6.3 Geology and Soils

Franklin County lies west of the Red Bedford Delta, a large regional geosyncline running from Tennessee to north-central Ohio. Bedrock in the facility area is Devonian age shale and limestone of the Columbus and Delaware formations and occurs about 90 feet below the ground surface (bgs) (ODNR, 1993). Wisconsin glacial deposits, composed mainly of silt and clay, overlie the bedrock.

Glacial depositional environments are usually quite unconsolidated. Sediments beneath the facility can generally be divided into the following units in descending order (Burmister, 1951; BBC&M, 1992; ODNR, 1993):

- 0 to 2 feet: Fill consisting of brown and black fine to coarse sand and clays
- 2 to 10 feet: Yellow-brown silt and clay, with some coarse to fine sand
- 10 to 75 feet: Gray silt and clay, with some coarse to fine sand
- 75 to 90 feet: Gray-brown silty clay, with a trace of fine sand
- 91 to 120 feet: Limestone bedrock with interbedded gray shale

Soils in the area are of the Crosby-Kokomo association. These soils are somewhat poorly drained and very poorly drained, formed mainly in medium textured and moderately textured glacial till (USDA, 1980).

2.6.4 Ground Water

The water table in the facility area is about 10 feet bgs (BBC&M, 1992). Ground-water movement is mainly to the northeast towards the Scioto River. Because of the thick clay deposits, glacial deposits in the facility area have limited ground-water resources and are usually of poor quality (PRC, 1993). However, buried river channels in the area can produce from 100 to 500 gpm (Todd, 1983). Bedrock aquifers in the area, developed in limestone formations, yield from 30 to 60 gpm. A number of industrial supply wells have been installed in the limestone formations, and all are screened at about 130 feet bgs. The nearest industrial well is about 300 feet northwest and upgradient of the property (ODNR, 1993). No drinking water wells are located within at least 3 miles of the facility (PRC, 1993).

2.7 RECEPTORS

The Consolidated facility occupies about 268 acres in mixed industrial and small business area of western Columbus, Ohio. Columbus has a population of about 630,000 (USDC, 1991). The facility is bordered to the north by Conrail railroad tracks, to the east by open land and a British Petroleum, Inc. oil refinery, to the south by a series of retail stores and two automobile dealerships, and to the west by a number of small businesses.

The nearest residential area is about 0.75 mile northeast of the facility. The nearest school is about 1 mile east. The facility is completely surrounded by a chain-link fence, excluding the west side of the main building. Consolidated has security personnel on site 24 hours per day, 7 days per week.

The nearest surface water bodies are Kinnard Ditch, which borders the southern edge of the property, and Dry Run, bordering the northern end. Kinnard Ditch flows northeast to the Scioto River about 2.75 miles from Consolidated. Dry Run flows east and enters Kinnard Ditch about 2 miles from the facility. Kinnard Ditch and Dry Run are used mainly for storm water drainage for local industries and businesses. Storm water drainage from the Consolidated facility is to both. About six additional, low volume, drainage routes are within 3 miles of the facility, all of which empty into the Scioto River. The Scioto River supplies drinking water for most of western Columbus. The nearest pumping station, the Dublin Road Water Plant, is about 3 miles northeast of the facility. The confluence of the Scioto River and Kinnard Ditch is about 4,000 feet upstream from the water plant.

Ground water is used only for industrial purposes in the area. The nearest industrial well is about 300 feet northwest and upgradient of the facility. No drinking water wells are located within at least 3 miles of the facility.

There are no sensitive environments within 2 miles of the facility (USGS, 1982).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former SAAs

Unit Description:

Columbus Products used 55-gallon drums, staged on concrete, for satellite accumulation throughout the facility. No designated areas for satellite accumulation were documented, and the location of the areas varied. When full, the drums were transferred to the Former Hazardous Waste Storage Area (SWMU 2) and segregated according to compatibility with other wastes.

Date of Startup:

An exact startup date for the units could not be determined. However, EPA and OEPA files indicate that satellite accumulation in 55-gallon drums always used.

Date of Closure:

Satellite accumulation ended in 1988.

Wastes Managed:

Wastes managed in the units included waste paint materials (F003 and D001); waste paint sludge (D001); waste methylene chloride (F002); waste 1,1,1-trichloroethane (F001); wastewater pretreatment sludge (F006); waste acid solution (D002); and nonhazardous waste oils and hydraulic fluids. Except for waste acid solution (D002), all these wastes were transferred to the Former Hazardous Waste Storage Area (SWMU 2).

Release Controls:

The drums were staged on concrete. Because the SAAs have been removed, PRC could not determine if they had additional release controls.

History of Documented Releases:

No releases from the SAAs were documented.

Observations:

Because satellite accumulation no longer occurs at the facility, PRC could not assess the SAAs.

SWMU 2**Former Hazardous Waste Storage Area****Unit Description:**

The Former Hazardous Waste Storage Area was indoors at the southeast corner of the main building. The unit measured 80 by 240 feet and had a capacity of about 800 55-gallon drums (see Photograph Nos. 1 and 2). It had a concrete base with segregated, bermed storage areas for noncompatible wastes. During the VSI, the concrete appeared to be coated with a sealant; however, Consolidated could not verify this. No floor drains were noted in the vicinity of the unit. When Columbus Products was operating, full waste drums from SAAs throughout the facility were brought to the area and placed in a specified location. The waste materials were usually pumped from the drums into a bulk tanker truck, and the empty drums were removed from the facility by a recycler. Currently, Consolidated uses the area to store wooden pallets, cardboard, and packaged merchandise.

Date of Startup:

An exact startup date for the unit could not be determined. However, EPA and OEPA files indicate that SWMU 2 was the only area ever used for drum storage of hazardous waste.

Date of Closure:

The unit was RCRA-closed in late 1983. After 1983, the unit was used for less than 90-day storage of hazardous waste. The closure was approved by EPA in September 1984 and by OEPA in April 1985.

Wastes Managed:

Wastes managed in the unit included waste paint materials (F003 and D001); waste paint sludge (D001); waste methylene chloride (F002); waste 1,1,1-trichloroethane (F001); wastewater pretreatment sludge (F006); and nonhazardous waste oils and hydraulic fluids. Waste paint materials were taken from the facility to Systech for fuels blending. Waste methylene chloride and waste 1,1,1-trichloroethane were taken to SRR for reclamation. Wastewater pretreatment sludge was taken to Fondessy for treatment and disposal. No documentation is available detailing the disposal of waste oils and hydraulic fluids.

Release Controls:

The area had a concrete floor with segregated, bermed storage areas for noncompatible wastes. During the VSI, the concrete appeared

to be coated with a sealant; however, Consolidated could not verify this.

**History of
Documented Releases:**

No releases from the unit were documented.

Observations:

The unit is no longer used for waste storage. During the VSI, PRC noted that all berms had been removed. No stains or signs of deteriorating concrete were observed.

SWMU 3

Former Paint Sludge Drying Area

Unit Description:

The Former Paint Sludge Drying Area was outdoors in the central eastern portion of the facility property, and was used by Columbus Products to dewater paint sludge. The unit consisted of a 24- by 24-foot concrete pad surrounded by a concrete berm (Columbus Products, 1980b). Sludge was transported to the unit in drums from SWMU 2, spread across the concrete pad, and allowed to air dry. The sludge was then shoveled back into the drums and transported to an off-site landfill (Columbus Products, 1981).

During the VSI, PRC could not locate this unit. Consolidated had not been informed by Columbus Products that the unit existed. The supposed location of the unit, as listed on the map with the original Part A permit application for Columbus Products and on a map of potential spill sources for the facility, is heavily overgrown with foliage. In the supposed vicinity, PRC noted a few segments of broken concrete; however, a structure could not be identified.

Date of Startup:

There is no documentation detailing when this unit was first used.

Date of Closure:

PRC believes the unit was last used in the early 1980s. It has not been RCRA-closed.

Wastes Managed:

The unit managed waste paint sludge (D001). The materials were allowed to air dry and then removed to an off-site landfill. PRC could not determine if the sludge was treated after it left the facility, or what landfill was used for disposal.

Release Controls: The unit was constructed of concrete and was surrounded by a concrete berm.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, the unit could not be located. The supposed location of the SWMU was heavily overgrown with foliage and was difficult to traverse during the VSI. In the supposed vicinity of the unit, PRC noted disturbed soils and a few segments of broken concrete; however, a structure could not be identified.

SWMU 4

Former Wastewater Pretreatment Area

Unit Description: The Former Wastewater Pretreatment Area was located indoors at the southeastern corner of the main building. In 1980, the unit was used for neutralizing waste acid solution and rinsewaters from an electroplating process. The waste acid solution was accumulated in Former SAAs (SWMU 1), transferred to SWMU 4, and slowly added to the system. Rinsewaters from the electroplating process flowed through the system continuously. Wastewater pretreatment consisted of adding a lime and caustic mixture to the pickle liquor solution. The treated wastewater was discharged to the City of Columbus sanitary sewer.

To improve wastewater treatment, the Wastewater Pretreatment Area was upgraded in 1984 and 1985. Columbus Products installed additional tanks and feed lines for a metal hydroxide precipitation system. All wastewater, which flowed at a rate of about 180 gpm during normal operating periods, was neutralized. The system generated wastewater pretreatment sludge (F006) and wastewater. The sludge was placed in 55-gallon drums in Former SAAs (SWMU 1), and eventually transferred to the Former Waste Storage Area (SWMU 2). Columbus Products generated about 11 55-gallon drums of sludge per month, which was taken to Fondessy in Oregon, Ohio for treatment and disposal. Pretreated wastewater was discharged to a City of Columbus POTW.

Date of Startup: PRC believes that basic neutralization of wastewater at the facility began in the early to mid-1970s. The unit was upgraded in 1984 and 1985.

Date of Closure: The unit was removed from the facility in 1988.

Wastes Managed: The unit managed waste acid solution (D002) and rinsewaters from an electroplating process. The unit generated wastewater pretreatment sludge (F006) and pretreated wastewater. Sludge was placed in 55-gallon drums and transferred to SWMU 2. Pretreated wastewater was discharged to the City of Columbus POTW.

Release Controls: No release controls for the system were documented.

History of Documented Releases: No releases from the unit were documented.

Observations: The unit was removed from the facility in 1988. The concrete floor of the area was free of severe cracks. PRC noted few of what appeared to be chemical stains.

SWMU 5

Waste Oil Storage Area

Unit Description: The Waste Oil Storage Area is outdoors just east of the center of the main building. The unit lies within the Former Liquid Materials Storage Area (AOC 1). Consolidated uses the area to store 55-gallon drums of nonhazardous waste oils from forklift trucks. The drums are stored on bare ground without release controls. The facility generates about one drum per month of the materials.

Date of Startup: The area has been used for waste oil storage since 1989.

Date of Closure: The unit is active.

Wastes Managed: The unit manages nonhazardous waste oils.

Release Controls: The unit has no release controls.

**History of
Documented Releases:**

No releases from this unit have been documented.

Observations:

During the VSI, the unit contained about 10 drums. PRC noted no stains; however, stressed vegetation was present near this area.

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. The AOC is discussed below; its location is shown in Figure 2.

AOC 1 Former Liquid Materials Storage Area

The Former Liquid Materials Storage Area is located just east of the main building, south of the boilerhouse and north of a loading ramp. Columbus Products used this area to store various liquid materials in aboveground storage tanks. Materials stored in the area included hydrogen peroxide, compressor oils, and waste oils.

Consolidated currently uses the area to store waste oils from forklift trucks in (SWMU 5) and debris. SWMU 5 has no release controls. During the VSI, PRC observed two stands for former aboveground storage tanks. As mentioned in Section 2.5, PRC identified a UST in this area just south of the boilerhouse (see Photograph No. 3). Consolidated did not know what the tank was used for or its capacity. PRC also noted stressed vegetation in the area but did not observe any stained soil or concrete (see Photograph No. 4).

Documentation from EPA and OEPA files indicates that over the years, this area was a main traffic area for chemical movement in and out of the facility. Because of the former and current use of the area, and the stressed vegetation and UST noted during the VSI, PRC considers the Former Liquid Materials Storage Area an AOC.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and one AOC at the Consolidated facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and the AOC. Table 3, at the end of this section, summarizes the SWMUs and the AOC at the facility and the recommended further actions.

SWMU 1 Former SAAs

Conclusions: The Former SAAs consisted of 55-gallon drums on concrete. The drums were removed from the facility when Columbus Products ended operations. Consolidated does not use satellite accumulation. Because the SAAs are no longer at the facility, the potential for release of hazardous constituents to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action.

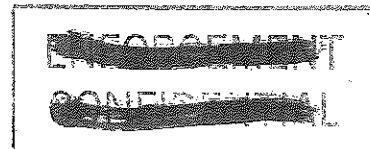
SWMU 2 Former Hazardous Waste Storage Area

Conclusions: The Former Hazardous Waste Storage Area was RCRA-closed in late 1983. The closure was approved by EPA in 1984 and by OEPA in 1985. Consolidated does not store waste in the unit. During the VSI, PRC noted no stains or severe cracks in the area. Because the unit is no longer used for hazardous waste storage, the potential for release of hazardous constituents to ground water, surface water, air and on-site soils is low.

Recommendations: PRC recommends no further action.

SWMU 3 Former Paint Sludge Drying Area

Conclusions: This unit was never RCRA-closed. Its supposed location is heavily overgrown with foliage and was difficult to traverse during the VSI. In the supposed vicinity of the unit, PRC noted disturbed soils and a few segments of broken concrete; however, a structure could not be identified. The potential for release via environmental media is summarized below.



On-Site Soils and Ground Water: Low to moderate. Because of the disturbed soils in the area, PRC believes that the unit may have been buried. If the unit was buried, on-site soils may be contaminated. Because of the shallow water table in the area, ground-water contamination is likely if on-site soils are contaminated.

Surface Water: Low. No surface water bodies are near the supposed location of this unit.

Air: Low. Possible contamination would likely be trapped in soils and ground water.

Recommendations: PRC recommends that a geophysical survey be performed in the supposed vicinity of this SWMU to determine if it was buried. Once the probable location of the unit is determined, the unit should be RCRA closed. Soil borings with continuous split-spoon sampling should be performed throughout the area to ground water. Soil samples should be analyzed for hazardous constituents. A number of the borings should be converted to ground-water monitoring wells, which should then be sampled and analyzed for hazardous constituents.

SWMU 4

Former Wastewater Pretreatment Area

Conclusions: This unit was completely removed in 1988 after Columbus Products ended operations at the facility. During the VSI, the concrete floor of the area was free of severe cracks. PRC noted few of what appeared to be chemical stains. Because wastewater pretreatment no longer occurs at the facility, and the unit was removed, the potential for this unit to release hazardous constituents to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 5

Waste Oil Storage Area

Conclusions: The Waste Oil Storage Area, within the Former Liquid Materials Storage Area (AOC 1), has been used since 1989. The unit has no release controls. During the VSI, PRC noted no stains on soils surrounding the drums.



However, stressed vegetation was noted near this area. The potential for release via environmental media is summarized below.

On-Site Soils and Ground Water: Low to moderate. PRC observed no sign of a release in this area. However, because no secondary containment is provided, spills would contaminate on-site soils and possibly ground water.

Surface Water: Low. No surface water bodies are near this unit.

Air: Low. The waste oils have low volatility.

Recommendations: PRC recommends that Consolidated provide secondary containment for this unit.

AOC 1

Former Liquid Materials Storage Area

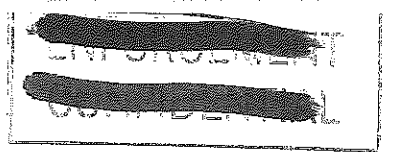
Conclusions: Columbus Products used this area to store various liquid materials in aboveground storage tanks. The SWMU 5 portion of this area is currently used by Consolidated to store waste oils from forklift trucks and debris. During the VSI, PRC observed two stands for former aboveground storage tanks and a UST. PRC also noted stressed vegetation in the area; however, no stained soil or concrete was seen. Documentation from EPA and OEPA files indicates that this area was a main traffic area for chemical movement in and out of the facility. The potential for releases via environmental media is summarized below.

On-site Soils and Ground Water: Low to moderate. Because this area was used for liquid material storage for an extended period of time, and because it was a main traffic area for chemical movement in and out of the facility, a release to on-site soils in this area may have occurred. Because of the shallow water table, releases to on-site soils would likely reach ground water.

Surface Water: Low. No surface water bodies are near this area.

Air: Low. Possible contamination would most likely be trapped in soils or ground water.

Recommendations: PRC recommends that soil borings with continuous split-spoon soil sampling be performed throughout this area to the ground water. Soil



samples should be analyzed for hazardous constituents. A number of the borings should be converted to ground-water monitoring wells, which should then be sampled and analyzed for hazardous constituents. Additionally, sludge samples should be taken from the partially buried UST in this area and analyzed for hazardous constituents.

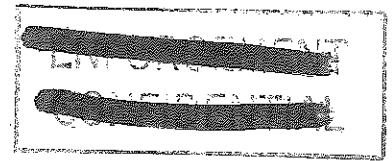


TABLE 3
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former SAAs	Unknown to 1988	None	None
2. Former Hazardous Waste Storage Area	Unknown to 1988	None	None
3. Former Paint Sludge Drying Area	Unknown to early 1980s	None	Perform a geophysical survey in the supposed location. The unit should be RCRA-closed. Perform soil borings in the area. Sample soils and ground water and analyze for hazardous constituents.
4. Former Wastewater Pretreatment Area	Early to mid-1970s to 1988	None	None
5. Waste Oil Storage Area	1989 to present	None	Provide secondary containment.

<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former Liquid Materials Storage Area	Mid-1950s to present	Stressed vegetation in the area.	Perform soil borings in the area. Sample soils and ground water and analyze for hazardous constituents. Sample sludge from UST and analyze for hazardous constituents.

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ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH 02 SITE NUMBER OHD095030979

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Consolidated Stores, Inc.	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 300 Phillipi Road				
03 CITY Columbus	04 STATE OH	05 ZIP CODE 43228	06 COUNTY Franklin	07 COUNTY CODE 005	08 CONG DIST
09 COORDINATES: LATITUDE 39°57'30"N		LONGITUDE 83°06'30"W			
10 DIRECTIONS TO SITE (Starting from nearest public road) From downtown Columbus, take I-70 west to the Wilson Road exit. Turn left onto Wilson Road and go to Fisher Road. Go right on Fisher Road and go to Phillipi Road. Turn left onto Phillipi Road. The facility will be on the left.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Consolidated Stores, Inc.	02 STREET (Business, mailing residential) 300 Phillipi Road				
03 CITY Columbus	04 STATE OH	05 ZIP CODE 43228	06 TELEPHONE NUMBER (614) 278-6762		
07 OPERATOR (if known and different from owner)	08 STREET (Business, mailing, residential)				
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency Name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 07/29/80 MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ MONTH DAY YEAR <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 11/02/92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): PRC Environmental Management, Inc.			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1954 present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Consolidated generates nonhazardous waste oils. Under the previous owner, Columbus Products, Inc., hazardous wastes generated included waste paint materials (F003 and D001), waste paint sludge (D001), waste methylene chloride (F002), waste 1,1,1-trichloroethane (F001), wastewater pretreatment sludge (F006), and waste acid solution (D002). The facility also generated wastewater and oils.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Potential soil and ground-water contamination.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input checked="" type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Pete Zelinskas	05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER (513) 241-0149	08 DATE 01/30/93 MONTH DAY YEAR

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (<i>Check all that apply</i>) <input type="checkbox"/> A. SOLID <input type="checkbox"/> E. SLURRY <input type="checkbox"/> B. POWDER, FINES <input type="checkbox"/> F. LIQUID <input type="checkbox"/> C. SLUDGE <input type="checkbox"/> G. GAS <input type="checkbox"/> D. OTHER _____ (<i>Specify</i>)	02 WASTE QUANTITY AT SITE <i>(Measures of waste quantities must be independent)</i> TON _____ CUBIC YARDS _____ NO. OF DRUMS _____ 10	03 WASTE CHARACTERISTICS (<i>Check all that apply</i>) <input type="checkbox"/> A. TOXIC <input type="checkbox"/> H. IGNITABLE <input type="checkbox"/> B. CORROSIVE <input type="checkbox"/> I. HIGHLY VOLATILE <input type="checkbox"/> C. RADIOACTIVE <input type="checkbox"/> J. EXPLOSIVE <input type="checkbox"/> D. PERSISTENT <input type="checkbox"/> K. REACTIVE <input type="checkbox"/> E. SOLUBLE <input type="checkbox"/> L. INCOMPATIBLE <input type="checkbox"/> F. INFECTIOUS <input type="checkbox"/> M. NOT APPLICABLE <input type="checkbox"/> G. INFLAMMABLE
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III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE	550	gallons	
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

[illegible]

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

U.S. EPA Region 5, and OEPA - Central District Files.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE
OH

02 SITE NUMBER
OHD095030979

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 630,000 04 NARRATIVE DESCRIPTION

Possible ground-water contamination from past releases.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

No hazardous waste is currently generated at the facility.

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

The facility is well-secured.

01 ☒ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: About 150 acres 04 NARRATIVE DESCRIPTION
(Acres)

Possible soil contamination from past releases.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

All drinking water in the area is from surface water.

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None

01 ☒ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 630,000 04 NARRATIVE DESCRIPTION

See above descriptions.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE
OH

02 SITE NUMBER
OHD095030979

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☒ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: 11/03/92)

☐ POTENTIAL

☒ ALLEGED

Stressed vegetation was noted at AOC 1.

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE:)

☐ POTENTIAL

☐ ALLEGED

None observed.

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE:)

☐ POTENTIAL

☐ ALLEGED

None observed.

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES
03 POPULATION POTENTIALLY AFFECTED:

02 ☐ OBSERVED (DATE: 11/03/92)

☐ POTENTIAL

☒ ALLEGED

04 NARRATIVE DESCRIPTION

No secondary containment is provided for nonhazardous waste oils.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE:)

☐ POTENTIAL

☐ ALLEGED

None observed.

01 ☐ O. CONTAMINATION OF SEWERS, DRAINS, WWTPS
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE:)

☐ POTENTIAL

☐ ALLEGED

None observed.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE:)

☐ POTENTIAL

☐ ALLEGED

None observed.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None

III. TOTAL POPULATION POTENTIALLY AFFECTED: 630,000

IV. COMMENTS

None

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

See Part 2, Section VI. Ohio Department of Natural Resources, U.S. Department of Agriculture.

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Consolidated Stores, Inc.
300 Phillipi Road
Columbus, Ohio 43228
OHD 095 030 979

Date: November 3, 1992

Primary Facility Representative: Mr. Albert Bell, Senior Vice President
Representative Telephone No.: (614) 278-6762
Additional Facility Representatives: Mr. Todd Noethen, Engineer

Inspection Team: Peter Zelinskas, PRC Environmental Management, Inc.
Chris Cappel, PRC Environmental Management, Inc.

Photographer: Chris Cappel

Weather Conditions: Sunny, cool, with temperatures between 50° and 55°F

Summary of Activities: The visual site inspection (VSI) began at 10:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed current facility operations; however, they had no information concerning Columbus Product's operations. The facility representatives agreed to provide PRC with a report on test borings of the subsurface in the area, recently performed by BBC&M Engineering, Inc., at a portion of the facility.

The VSI tour began at 11:00 a.m. PRC was walked through the interior of the main building and then along its exterior. PRC was then left alone to walk about the undeveloped areas of the facility, including the interior of the shipping/receiving building. Because all manufacturing equipment was removed when Consolidated purchased the facility, most SWMUs were no longer present. PRC was unable to locate the Former Paint Sludge Drying Area (SWMU 3).

The tour concluded at 1:45 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 2:00 p.m.



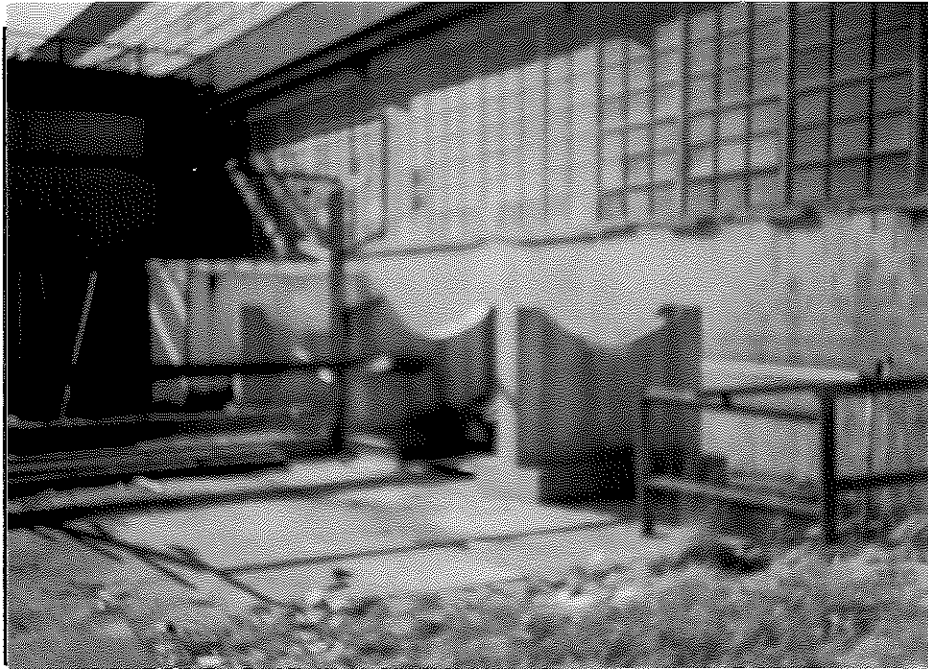
Photograph No. 1
 Orientation: South
 Description: The Former Hazardous Waste Storage Area.

Location: SWMU 2
 Date: 11/03/92



Photograph No. 2
 Orientation: North
 Description: The Former Hazardous Waste Storage Area.

Location: SWMU 2
 Date: 11/03/92



Photograph No. 3

Orientation: Southwest

Location: AOC 1

Date: 11/03/92

Description: A location of a former aboveground storage tank in the Former Liquid Materials Storage Area.



Photograph No. 4

Orientation: Northwest

Location: AOC 1

Date: 11/03/92

Description: The UST in the Former Liquid Materials Storage Area.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

13-98

1

VSI at (Consolidated States

300 Milling Rd.

Columbus, OH

Formerly Columbus Products

(Now Old Lots)

Site Contained All Ball

1000 (Conditions - Very Good)

Con. bought in 1980.

Majority 1987. Now

retail distribution. 2.6 million

square feet indoors. Supplied

by City water. Served

W. Broad. water from the

same

* Before transfer of property

all manufacturing equipment

and waste was removed.

850 (1,600 including office)

Employees 3 shifts

Letter - Telephone 11-8-98

Con. V. have Deformed
a number of bearings
at the facility for
expansions of the
buildings.
Todd Noethen - Engineer
sitting in to supply
information. Not helpful
concerning past processes
at the facility.

* Electroless

* No permits

1100 Duss did talk in with
Compass

* 10 Former waste storage
area. Remnants of tanks.

* 7, 16, 17 Removed. Down
dead song. 20 x 20

Piping still present -

Forster, Schneider 11-3-83

* All tanks are gone
3, 4, 8 outside tanks
have been removed. Piping
structure still remains.

* Minor signs of some
type of excavation.

* No staining. Debris and
skids laying about.

* Appears some drums
lines remain near tank 3.

* A 20 empty drums from
former waste oil. Bare ground

* Difficult to tell where
tanks were. No staining.

* Excavation for five
lines. No other on water.

* Near water tower

* Coal cone yet. Ash
drop off zone.

Forster, Schneider 11-3-83

4

- Was a boiler area.
- Halted in 1974. Western drain in this area.
- 250,000 gallon water tank. Heated.
- Tank unknown now.
- * Transformers - No visible staining.
- * Former coal storage area used now for trailer parking.
- * UST Area, no sign of anything, no staining.
- * Drainage area through coal field. No signs of discharge.
- * Making an effort to locate paint storage area.

Edo H. Zimmerman 11-3-92

5

- * Located what appears to be remnants of a building just inside the gate. Cannot tell.
- * Walked all around area. Many parts are completely grown over.
- * Have gone into enclosed area. Have located what appears to be an area where sludge was dumped. Cannot tell what type.
- Some coal. May be better ash.
- Could not definitely identify paint sludge area. Some concrete, however no identifiable structure.

Edo H. Zimmerman 11-3-92

64 RA

Returning to main facility
building.

1345 Closing discussion with
Consolidated Stores. These
guys have not supplied
us with much information.
1400 PRC exiting facility

~~John P. Zimardo~~ 11-3-93